

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Criminal Action No. 21-cr-00165-RM

UNITED STATES OF AMERICA,

Plaintiff,

v.

2. CHANDLER SIMBECK,

Defendant.

MOTION FOR WRIT OF HABEAS CORPUS AD PROSEQUENDUM

The United States of America, by and through the United States Attorney for the District of Colorado, petitions the Court for Writ of Habeas Corpus Ad Prosequendum and states as follows:

1. The Defendant, Chandler Simbeck, DOB: 07/26/1992, Jail ID: P00002274, Inmate number: B2203336, is now confined in the Larimer County Jail.

2. A hearing in the above-captioned case will be held forthwith in the United States District Court for the District of Colorado before a United States Magistrate Judge, and it is necessary that he be present in person during the proceedings, appearances, and final disposition of this case.

WHEREFORE your Petitioner moves the Court to order that a Writ of Habeas Corpus Ad Prosequendum be issued by this Court to the United States Marshal for the District of Colorado, or any other United States Marshal, or to any other federal law enforcement officer, requiring said federal law enforcement officer to serve the writ on the

Warden, Superintendent, or Custodian of any place or institution where the Defendant is confined, and requiring said federal law enforcement officer to produce the Defendant before a United States Magistrate Judge for the said defendant's initial appearance; and to hold the said defendant at all times in custody as an agent of the United States of America; and that immediately after the conclusion of the proceedings and final disposition of the above-entitled case in the United States District Court for the District of Colorado, shall return the said defendant to the institution where he was confined, under safe and secure conduct.

Respectfully submitted this 12th day of August, 2022.

COLE FINEGAN
UNITED STATES ATTORNEY

By: *s/Robert Brown*
Robert Brown
Assistant United States Attorney
United States Attorney's Office
1801 California Street, Suite 1600
Denver, Colorado 80202
Telephone: (303) 454-0100
Email: Robert.Brown5@usdoj.gov
Attorney for the Government

CERTIFICATE OF SERVICE

I certify that on this 12th day of August, 2022, I electronically filed the foregoing **MOTION FOR WRIT OF HABEAS CORPUS AD PROSEQUENDUM** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record in this case.

By: s/Elaina Wohr
Legal Assistant
United States Attorney's Office