UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	**Case No. 26-cr-247 (JMC)**
	:	
ANTHONY WINSLOW,	:	
Also known as "Ant,"	:	
	:	
Defendant.	:	
	:	

GOVERNMENT'S MEMORANDUM IN SUPPORT OF PRE-TRIAL DETENTION

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully submits this memorandum in support of its motion to detain the Defendant, Anthony Winslow, pending trial.

The Defendant, a 44-year-old man and three-time convicted felon (all for firearms offenses), is charged with unlawful possession with intent to distribute and distribution of fentanyl resulting in death for causing the death of a 20-year-old man, John "Jack" Patrick Hargreaves, from Sterling, VA, who was suffering from addiction, between May 19 and May 20, 2024. ECF No 1. The indictment alleges two dates because the evidence in this case shows that the Defendant drove around with Mr. Hargreaves' body for at least several hours after the Defendant provided him fentanyl pills before finally dropping him off at a fire station in Northeast DC.

At his expected initial appearance on October 22, 2026, the Government will move for Winslow's detention. By virtue of the offenses alleged, there is a rebuttable presumption that no conditions or combinations of conditions can reasonably assure protect the safety of the community, pursuant to 18 U.S.C. §§ 3142(e)(3)(A). Pursuant to the facts, circumstances, and authorities presented herein (and at the detention hearing to be held in this case), the Government respectfully submits that Winslow should be detained pending trial.

FACTUAL BACKGROUND

This case arises from an MPD and DEA investigation into the fentanyl-induced death of Jack Hargreaves. On May 20, 2024, in the early morning around 6am, Defendant Winslow drove the decedent (Hargreaves) in his own vehicle, an Infiniti sedan, to a fire station located at 50 49th Street NE, Washington, DC. Hargreaves was pronounced deceased at the fire station. The Defendant reported to responding officers that the decedent picked him up the night before in DC, they drove to the Defendant's friend's house in Virginia, and he took over driving when the decedent began driving erratically because he had taken Xanax or Percocet. The Defendant drove to the fire station with the decedent already deceased in the passenger's seat.

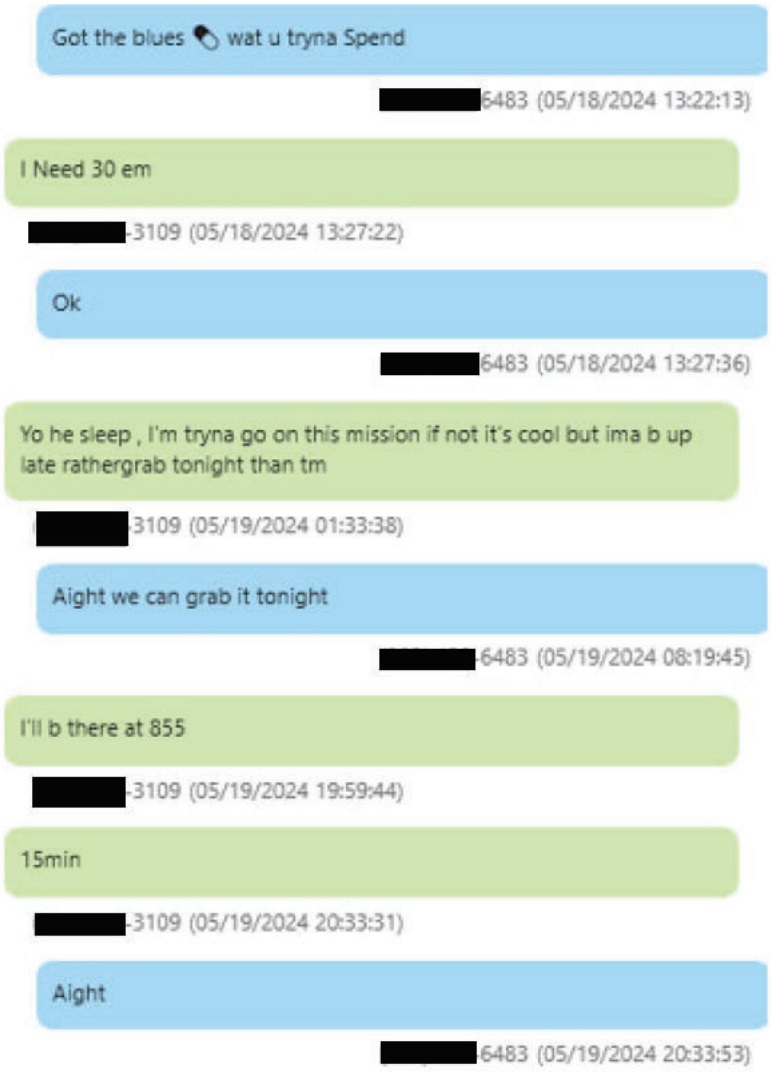
The D.C. Office of the Chief Medical Examiner (OCME) responded to the fire station. They recovered four blue M30 pills from the decedent's left sock. Officers also found the decedent's wallet and cell phone in the Infiniti. The four blue M30 pills were sent to the DEA Laboratory for chemical analysis and confirmed that they were counterfeit oxycodone pills, which contained fentanyl[1]. The wallet contained the decedent's credit cards and identification, but no cash. Hargreaves' toxicology showed therapeutic levels of alprazolam (Xanax) and potentially fatal levels of fentanyl. The autopsy ruled out any illnesses or disease as a cause of death. The body had signs of rigor mortis and lividity, suggesting that a lengthy period of time had passed before Hargreaves was extracted from the passenger's seat.

The investigation revealed that the Defendant was selling Hargreaves narcotics for at least two months, as evidenced by text messages starting on March 2, 2024. Indeed, the entirety of their

[1] M30 blue pills, often fake oxycodone pills, are commonly referred to as "Blues." *See* https://www.dea.gov/sites/default/files/2021-05/Counterfeit%20Pills%20fact%20SHEET-5-13-21-FINAL.pdf

communications between March 2, 2024 until Hargreaves' death consisted of discussions of prices for narcotics, quantity of narcotics Hargreaves wanted to purchase, and meeting locations. Hargreaves' Apple Pay records show payments from Hargreaves to Winslow ranging from $30 to $300 between March 29, 2024 and May 17, 2024. All of the payments were from Hargreaves to Winslow and not the other way around. From the text message communications, it was apparent that Winslow supplied Hargreaves with narcotics between March and May 20, 2024.

The text messages extracted from Hargreaves' phone also paints a clear picture of the events leading up the night of his death. On May 18, 2024, the Defendant texts Hargreaves "Got the blues [pill emoji] wat u tryna Spend" and Hargreaves responds, "I Need 30 em". At 1:33am on May 19, 2024, Hargreaves tells the Defendant that he would "rather grab tonight than tm". Winslow responds, "Aight we can grab it tonight". At 7:59pm on May 19, 2024, Hargreaves tells the Defendant that "I'll b there at 855" and at 8:33pm, Hargreaves sends an update saying "15 min". At 8:48pm, Hargreaves calls Winslow on FaceTime and they speak for 44 seconds. The last phone activity from Hargreaves' phone was a 9:29pm canceled call from Hargreaves to the Defendant. After this last attempted outgoing call at 9:29pm, several people called Hargreaves' phone, including two missed calls at 10:41pm and later calls from his mother and brother, but Hargreaves did not answer of any of these, suggesting that Hargreaves was already passed out by 10:41pm on May 19, 2024.



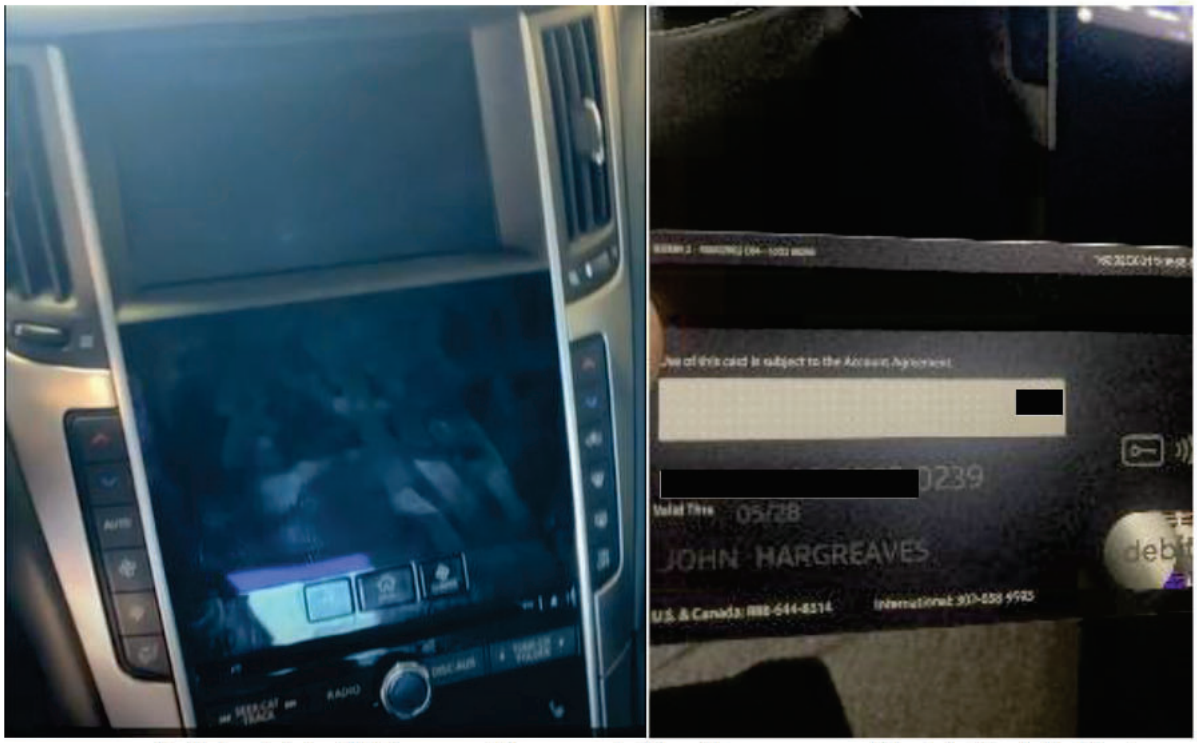
Text message communication between Winslow and Hargreaves leading up to the night of Hargreaves death. Winslow's number ends in 6483 and Hargreaves' number ends in 3109.

Bank records from the decedent's bank account show that on May 19, 2024, he went to a Wells Fargo ATM[2] about 2.5 miles from his home in Sterling, VA and withdrew $500. At the time of Hargreaves' death, although a wallet was recovered, there was no cash inside.

By 11:45pm on May 19, 2024, the decedent was apparently unconscious or deceased

[2] The government was unable to obtain the time of the withdrawal from Wells Fargo.

already because Winslow takes a series of photos of Hargreaves' bank cards from the driver's seat of the decedent's Infiniti. It appears that Winslow has gone through the decedent's wallet and was capturing the credit card numbers from his phone camera. These images were saved to Winslow's iCloud.

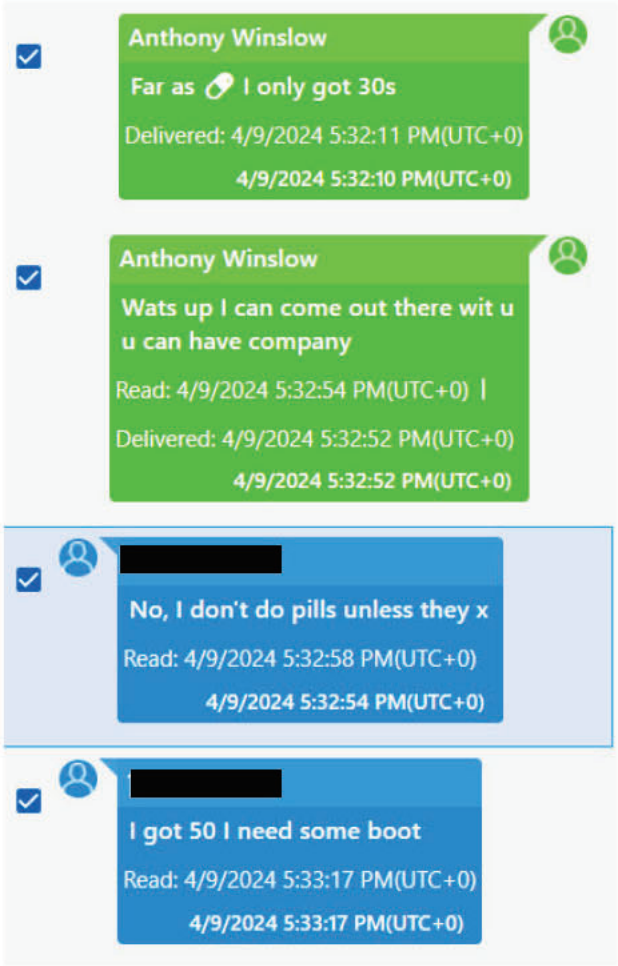


Left to right: still from a video created by Hargreaves of inside his Infiniti; image uploaded to Winslow's iCloud of an apparent photo of Hargreaves' credit card numbers taken from inside the Infiniti.

Hargreaves' Infiniti was equipped with a dash cam that pointed outwards from the windshield. Investigators were able to recover some but not all of the videos recorded from the Infiniti. The dash cam showed that at 10:25pm on May 19 2024, the Infiniti was near 6400 Commerce Street in Springfield, VA. This would be consistent with Winslow's account that Hargreaves picked him up in DC and they then drove together to Virginia. By 2:25am on May 20, 2024, the car was stationary and parked on Benning Road and A Street SE, near the DMV. It

appears from the dash cam that the car remained there until 4:11 am, at which time it began moving again. By 4:38am, the car was parked outside 1644 Gales Street NE until 5:38am. This address was where the Defendant was staying at the time. Shortly after 5:38am, the Defendant drove the car to the fire station at 50 49th Street NE with Hargreaves already deceased.

A review of Winslow's iCloud also revealed that Winslow was a dealer of narcotics to other people. For instance, on April 9, 2024, he texted an individual, "Far as [pill emoji] I only got 30s." On April 22, 2024, an individual asks him "You got boot" and Winslow responds, "No just down." On April 1, 2024, Winslow tells an individual "Yea only got down n Percs."



Text message communication between Winslow and another individual showing Winslow selling counterfeit M30s to other consumers.

PROCEDURAL HISTORY

On October 20, 2026, a federal grand jury in the District of Columbia returned an Indictment charging the Defendant with one count of Unlawful Possession with Intent to Distribute and Distribution of Fentanyl Resulting in Death or Serious Bodily Injury in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C). Winslow was arrested near his residence on October 21, 2026. Following his arrest, Winslow was read his *Miranda* rights and he invoked.

LEGAL STANDARDS

Pursuant to 18 U.S.C. § 3142(e)(3)(A), there is a rebuttable presumption that no conditions nor combinations of conditions can effectively ensure the Defendant's appearance in this case and otherwise protect the community. Accordingly, "[s]ubject to rebuttal by the person, it shall be presumed that no condition or combination of conditions will reasonably assure the appearance of the person as required and the safety of the community if the judicial officer finds that there is probable cause to believe that the person committed" the predicate offense. 18 U.S.C. § 3142(e)(3). The indictment, standing alone, constitutes probable cause that the person charged committed the offenses charged and is "enough to raise the rebuttable presumption that no condition would reasonably assure the safety of the community." *United States v. Smith*, 79 F.3d 1208, 1210 (D.C. Cir. 1996); *accord United States v. Williams*, 903 F.2d 844, 844 (D.C. Cir. 1990).

As the D.C. Circuit has explained, "the presumption operate[s] at a minimum to impose a burden of production on the defendant to offer some credible evidence contrary to the statutory presumption." *United States v. Alatishe*, 768 F.2d 364, 371 (D.C. Cir. 1985). But even if the burden of production is met, the presumption "does not disappear entirely," but rather "remains a factor to be considered among those weighed by the district court." *United States v. Mercedes*,

254 F.3d 433, 436 (2d Cir. 2001). The Government retains the ultimate burden of persuasion by clear and convincing evidence that the defendant presents a danger to the community even where it is presumed that those standards are satisfied. The Government must establish by clear and convincing evidence that a defendant is a danger to the community. *United States v. Peralta*, 849 F.2d 625, 626 (D.C. Cir. 1988). Furthermore, under the Bail Reform Act, the Government may proceed by way of proffer. *See*, *e.g., United States v. Smith*, 79 F.3d 1208, 1210 (D.C. Cir. 1996); *United States v. Hong Vo*, 978 F. Supp. 2d 41, 42 (D.D.C. 2013).

In considering whether there are conditions of release which will reasonably assure the safety of any other person and the community, the Court should consider and weigh the following factors: (1) the nature and circumstances of the offense charged; (2) the weight of the evidence against the Defendant; (3) his history and characteristics; and (4) the nature and seriousness of the danger to any person or the community that would be posed by his release. *See* 18 U.S.C. § 3142(g).

ARGUMENT

In consideration of these factors, the Government respectfully submits that there is no condition, or combination of conditions, that would assure the safety of a person or the community.

A. Nature and Circumstances of the Offense Charged

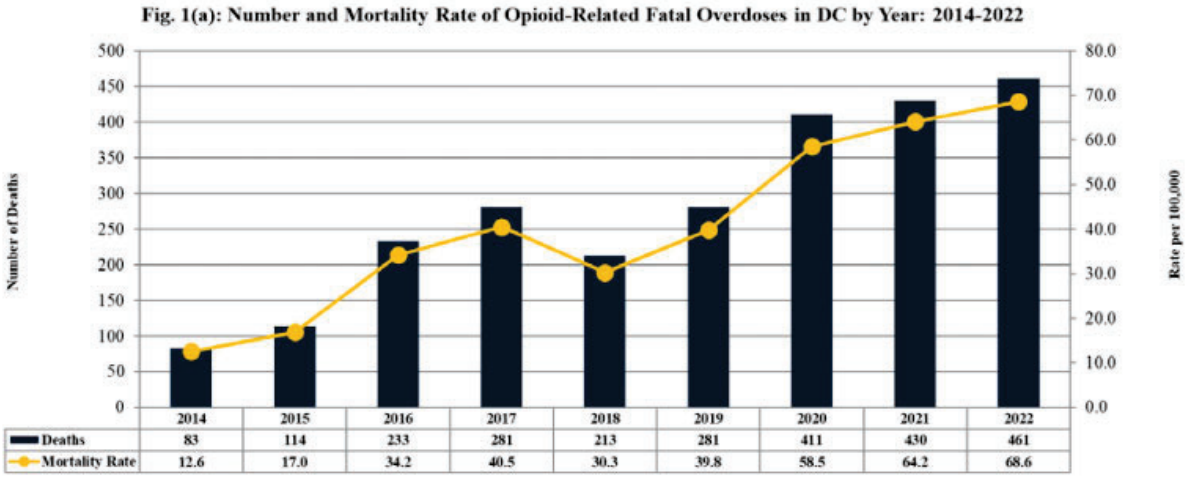
The Defendant is charged with an extremely serious offense—the most serious offense under 21 U.S.C. § 841—drug distribution resulting in death. Winslow sold counterfeit pills laced with fentanyl and as a direct result, a 20-year-old young man who was battling addiction died. Winslow's danger to the community is not hypothetical nor speculative, it is present and real. Winslow dealt drugs to John "Jack" Hargreaves for over two months leading up to his death, and

on May 19, 2024, he sold him the counterfeit pills that killed him. The circumstances of this offense were particularly callous. Winslow drove around with the decedent unconscious or deceased for hours before he brought him to the fire station on the morning of May 20, 2024. By the time Hargreaves arrived at the fire station, his body had already become stiff, suggesting that he had already been deceased for several hours. The dash cam from the Infiniti confirmed that Winslow drove the decedent to Winslow's own residence on Gales Street, where he parked the car for one hour and 20 minutes. Certainly, this was an opportunity for Winslow to stash any items, including cash that Hargreaves might have had on his person. Afterall, there is photographic evidence that Winslow nefariously recorded the credit card numbers of Hargreaves' credit cards. Instead of seeking medical help at the first sign of an overdose, Winslow took his time with the decedent's body, driving from place to place, ending at his own residence, all before going to the fire station and presumably to allow enough time to make a plan for himself.

The government need not belabor the point—fentanyl remains the deadliest cause of drug-related overdose deaths in the United States. Fentanyl, a synthetic opioid, is approximately 50 times more potent than heroin and 100 times more potent than morphine; fentanyl is so powerful that even a small amount can cause a fatal overdose.[3] Its danger is compounded by its frequent presence in counterfeit prescription pills and other illicit drugs, often without the knowledge of the individuals consuming them.[4] As the DEA warns, "[t]wo milligrams of fentanyl can be lethal depending on a person's body size, tolerance and past usage."[5] Further, the use of fentanyl—and

[3] CDC, Fentanyl Facts (Apr. 2, 2024): https://www.cdc.gov/stop-overdose/caring/fentanyl-facts.html
[4] CDC, Fentanyl (June 9, 2025): https://www.cdc.gov/overdose-prevention/about/fentanyl.html
[5] https://www.dea.gov/resources/facts-about-fentanyl

the maleffects from that usage—are markedly on the rise. In fact, as of May 2023, more Americans died from overdose deaths than combined vehicle and firearms-related deaths[6]. Overdose deaths due to fentanyl and fentanyl analogs in the District of Columbia in 2023 were 98% of all overdose deaths.[7] The graph below provided by the D.C. Office of the Chief Medical Examiner shows that fentanyl deaths continue to be on the rise:[8]



Moreover, the Defendant faces a lengthy period of incarceration if convicted—a mandatory minimum of 20 years of incarceration. Indeed, Winslow is charged with an offense to which Congress saw fit to attach the non-bursting presumption of detention, underscoring the severity of the charge against him. Even if Winslow's Guidelines range is less than 20 years, he would also

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6 https://www.getsmartaboutdrugs.gov/news-statistics/2023/05/11/more-drug-overdose-deaths-combined-vehicle-and-firearm-related-deaths

7 https://ocme.dc.gov/sites/default/files/dc/sites/ocme/agency_content/Opioid%20related%20Overdoses%20Deaths_Jan%202024.pdf

8 https://ocme.dc.gov/sites/default/files/dc/sites/ocme/agency_content/Opioid%20related%20Overdoses%20Deaths_Jan%202024.pdf

not be safety-valve eligible due to his criminal history and the death he caused. *See* 18 U.S.C. § 3553(f).

B. Weight of the Evidence

The weight of the evidence against the Defendant is assuredly strong. The text message communications clearly show that Winslow intended to distribute blue pills to Hargreaves on May 19, 2024, following a two-month relationship of Winslow dealing to Hargreaves. Their meetup is also confirmed by virtue of Winslow driving Hargreaves to the fire station on the morning of May 20, 2024 and his admission that Hargreaves picked him up the night before. From Hargreaves' person, OCME recovered four blue pills. The pills were stamped with M30, indicative of counterfeit oxycodone pills. The pills tested positive for fentanyl and Hargreaves' toxicology showed that he died from fentanyl poisoning. There is no evidence that Hargreaves met anyone else that night to purchase blue pills.[9] In sum, evidence supporting the narcotics distribution and direct result of death is significant and favors detention.

[9] The decedent's family did recover marijuana from the Infiniti along with a variety of other pills in Hargreaves' bedroom. Those recovered pills were sent to the DEA lab and tested; none of the other pills recovered contained fentanyl.



Photo of actual pills recovered from Hargreaves that Winslow sold him on May 19, 2024.

C. History and Characteristics of the Person

Winslow's history and characteristics clearly favor detention. As of the filing of this memorandum, the government does not have the Defendant's pretrial services report. However, the government is aware of at least three felony convictions, each involving firearms, for the Defendant. This instant case is Winslow's *second* federal case in D.C.

In 2006, Winslow was indicted with felon in possession in violation of 18 U.S.C. § 922(g), in case number 06-cr-346-EGS. In that case, in November 2006, MPD pursued at a high rate of speed, with lights and audible sirens, along with a helicopter spotlight, a vehicle driven by Winslow. Govt's Sent. Memo, Case 1:06-cr-00346-EGS, ECF No. 26, at 1-2. At some point during the pursuit, defendant Winslow stopped the vehicle in the 4600 block of A Street, S.E., in the District of Columbia, he then exited the vehicle, fled on foot, and entered a row house located at 4654 A Street, S.E. *Id*. at 2. At the time that MPD officers entered the 4654 A Street house,

other MPD officers located a loaded 9mm Ruger P95, in plain view, on the driver's seat of the vehicle that defendant Winslow was seen driving. *Id*. Winslow was convicted of 18 U.S.C. § 922(g)(1) by a felon and received a 70-month federal sentence followed by three years of supervised release. Due to non-compliance with the terms of his supervision in addition to being re-arrested, his supervised release was revoked, and he was sentenced to another 24 months of incarceration in January 2013. Just before this, he was convicted and sentenced in D.C. Superior Court for Robbery and Possession of a Firearm During a Crime of Violence in case number 2012 CF3 13811 to 72 months of incarceration. Undeterred by a federal gun conviction and a robbery conviction, Winslow went on to commit yet another crime resulting in a conviction. In 2019, he was convicted of a second felon in possession case in D.C. Superior Court case number 2019 FD3 2628 where he received 18 months of incarceration and three years of supervised release. This final period of supervision likely spanned into 2024—the charged time period in this case when Winslow was selling drugs again; this time, killing someone by doing so. Finally, from law enforcement databases, it appears that Winslow has a 2001 possession of marijuana conviction, a 2002 possession of cocaine conviction, and a 2013 Failure to Appear conviction.

Even if the Defendant's ties to the community or employment are proffered to rebut the presumption here, this criminal record and previous non-compliance on supervision clearly and convincingly demonstrates that the Court can have no confidence Winslow will comply with any condition of release.

D. Nature and seriousness of the danger posed by release

The nature and seriousness of the danger posed by release favors detention. Additionally, the strong weight of the evidence and the 20-year mandatory minimum the Defendant faces if

convicted create a flight risk. While the available evidence stems from 2024, Winslow's history suggests that his actions in 2024 were not an anomaly nor a deviation from an otherwise straight and narrow path. His criminal history, going back to 2001 and continuing through 2024, suggests that this was a lifestyle he chose and in 2024, he was still on that decades-old trajectory. Winslow is a three-time convicted felon (for offense all involving firearms) with previous drug convictions who re-engaged in drug dealing despite many opportunities at rehabilitation. His continuing criminal conduct directly resulted in the death of another human being. The Defendant's release on any condition would pose a grave danger to the community.

CONCLUSION

The Government respectfully requests that the Court grant the Government's motion to detain Defendant Anthony Winslow pending trial.

Respectfully submitted,

JEANINE FERRIS PIRRO
United States Attorney

Iris McCranie
Iris McCranie
Assistant United States Attorney
N.Y. Bar Reg. No. 5011234
601 D Street, NW
Washington, D.C. 20530
202-252-7828
Iris.mccranie@usdoj.gov