

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)	
)	
v.)	1:21CR40
)	Status Hearing: December 17, 2021
DAVID LEE JUDD)	

**DAVID JUDD’S MOTION FOR PERMISSION TO TRAVEL TO ATTEND FAMILY
MEMORIAL SERVICE**

David Lee Judd (“Mr. Judd”), through counsel, respectfully moves this Court for an Order granting permission for Mr. Judd to travel from his home in Texas to Florida to attend a family memorial service for his grandmother and aunt, who both recently passed away. Mr. Judd has been under conditions of release since May 13, 2021 and has not incurred a single violation. Based on his track record of compliance, this Court removed Mr. Judd from home detention on October 10, 2021. Doc. No. 146. Mr. Judd’s probation officer does not oppose his plan to travel but has represented she needs a Court Order to approve Mr. Judd’s request.¹ In support of this Motion, counsel states:

1. Mr. Judd is before the Court charged by Indictment with offenses arising out of the events of January 6, 2021.
2. Following the detention hearing in this matter, Mr. Judd was ordered released with conditions, including location monitoring and home detention. *See* Doc. No. 60 (Order setting conditions of release). Mr. Judd was released on May 13, 2021 and returned to

¹ Undersigned counsel has reached out to the government and it has not responded with its position.

his home in Texas. Since his release, Mr. Judd has incurred no violations of release. He is currently on location monitoring with a curfew.

3. Mr. Judd's family has recently lost two family members—his grandmother and his great aunt. The family has planned to gather for a family reunion and memorial service in Boca Raton, Florida. Mr. Judd would like to travel with his mother, departing Dallas, Texas on December 2 and returning on December 6. While in Florida, he will stay with his mother and other family members at family member's home. He will provide the flight details and location to his probation officer.
4. Mr. Judd's probation officer, Tiffany Hough, represented that because Mr. Judd has a curfew, a Court Order is required for her to approve Mr. Judd's travel. Undersigned counsel will provide chambers with Ms. Hough's contact information should the Court wish to contact her directly.
5. Mr. Judd is a 35-year-old with no history of violence or prior convictions. He is a college graduate and has earned a degree in hospitality management. He is currently employed full-time at "Total Wine" and works part-time for the Dallas Cowboys, managing concession stands when the team plays at the Dallas stadium. He teaches Bible study at his church and volunteers with the Fallen Officers Foundation. Mr. Judd's past record and his record on pre-trial release demonstrate that he is neither a flight risk or a danger to the community.

Conclusion

For the reasons stated herein and any others that appear to the Court, Mr. Judd respectfully moves the Court to grant permission for to travel to Boca Raton, Florida on December 2 and return December 6, 2021, so that he may attend a family memorial service.

Respectfully submitted,

David Judd

By Counsel

_____/s/_____
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CERTIFICATE OF SERVICE

I hereby certify that on November 18, 2021, I will electronically file the foregoing pleading with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

_____/s/_____
Elizabeth Mullin
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