

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

CASE NO.: 21-CR-129

Plaintiff,

vs.

Gabriel Garcia,

Defendant.

**AMENDED UNOPPOSED MOTION FOR PERMISSION TO TRAVEL TO THE
DISTRICT OF COLUMBIA**

COMES NOW, the Defendant, Gabriel Garcia, and files his motion for permission to travel to the District of Columbia and states the following grounds:

GROUND

1. Mr. Garcia respectfully requests to travel to, and enter into, the District of Columbia on March 1, 2023, to observe two J6 jury trials that are occurring this week: USA v. Gossjankowski, 21-CR-123-PLF, and USA v. Tarrío, et al., 21-CR-175-TJK, and also any other J6 trials or court proceedings occurring.

2. Mr. Garcia would not stay any night in the District. He would commute over from Virginia or Maryland. He would not go anywhere else in the District other than the courthouse, and to his former pro hac vice attorney's law offices to confer about retaining him for trial. He would fly back on March 5, 2023.

3. Mr. Garcia will provide his pretrial officer all of the information regarding his travel and lodging, as he did the previous times when he has traveled with this Court's permission.

4. His pretrial services officer does not object to this request. The Government was

contacted for their position, and they do not object, as long as the same conditions are in place that were imposed on his previous visit to D.C. last year to observe a trial.

MEMORANDUM OF LAW

This Court can grant Mr. Garcia's request under 18 U.S.C. § 3142. While his conditions of release do prohibit him from coming to D.C., there is an exception for court and pretrial business. Further, Mr. Garcia has no criminal history; the Government has not charged him with committing a violent act on a law enforcement officer; and he is not accused of destroying any property. Mr. Garcia only wishes to enter D.C. to go to the courthouse to observe the two named trials and confer with his former pro hac vice counsel. Mr. Garcia submits observing the trials will assist in trial preparation and his ultimate decision to go to trial or enter a change of plea. This undersigned counsel will escort him at all times in the courthouse. He will not go anywhere else, and he will leave the District by 5 p.m. In addition, this Court allowed him to travel to D.C. to attend a trial this past June, which he did without incident.

WHEREFORE, Mr. Garcia respectfully moves this District Court to allow him to travel to the District of Columbia for the reasons stated above.

Respectfully submitted,

/s/Aubrey Webb
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was efiled to the Office of the Clerk, United States District Court, District of Columbia, 333 Constitution Ave., N.W. Washington D.C. 20001, Room 1225 and to the Office of the United States Attorney, 555 4th St N.W., Washington D.C. 20530, on March 1, 2023.

/s/Aubrey Webb