

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

GLENN ALLEN BROOKS

Defendant.

Case No. 1:21-CR-00503-RCL

UNOPPOSED MOTION TO MODIFY BOND

Defendant, Glenn Allen Brooks, by and through his attorney of record, Deputy Federal Public Defender Jonathan K. Ogata, hereby moves for an entry for an order modifying conditions of bond to:

1. Release Mr. Brooks' passport for the purpose of international travel as listed below;
2. Permit Mr. Brooks to travel internationally to Haiti to visit with two ministries (1) F.A.R.M Haiti operated by Mary Anderson Harris with U.S. operations headquarters located at 1201 1st Street NE, New Prague MN 56071, and (2) Promise for Haiti operated by Guy Theodore M.D., with an operational address at Hospital Bienfaisance, 38 Rue de, Pignon, Haiti and U.S. operations headquarters in Belmont NC 28012;
3. Permit Mr. Brooks' above referenced international travel on the following travel schedule:
 - a. December 12, 2021, fly to Orlando, Florida and commute to Missionary Flights International ("MFI") located at 3170 Airmans Drive, Fort Pierce, Florida 34946;
 - b. December 14, 2021, board MFI's vintage DC3 with other missionaries, fly to Cap Haitien, Haiti, and clear customs before flying to a small regional dirt landing strip airport in Pignon, Haiti;
 - c. December 14 through 16, 2021, conduct agricultural consultation for missionary business with the two organizations indicated above;
 - d. December 16, 2021, reboard MFI's DC3 in Pignon, Haiti, and fly back to Fort Pierce, Florida to clear customs;

- e. December 17, 2021, return to Orlando, Florida for a flight back to Orange County, California same day.

On November 9, 2021, Counsel for Defendant inquired regarding the government's position modifying Defendant's bond for the purpose of international travel from December 12 through 17, 2021. On November 12, 2021, the government, by and through Assistant United States Attorney Laura E. Hill, provided that the government takes no position on Mr. Brooks' international travel to Haiti in December.

Defendant respectfully requests this Court grant his unopposed motion to modify bond.

Respectfully submitted,

CUAUHTEMOC ORTEGA
Federal Public Defender

DATED: November 15, 2021

By */s/ Jonathan K. Ogata*

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