

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>No. 21-CR-157 (TNM)</b>
	:	
	:	<b>Status Hearing Nov. 12, 2021</b>
<b>CHRISTIAN SECOR,</b>	:	
<b>Defendant.</b>	:	
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**CONSENT MOTION TO TRAVEL**

Christian Secor, through counsel, respectfully requests this Court allow him to travel with his family November 19-27, 2021.

In support of the motion Counsel states the following:

1. Mr. Secor is currently in the High Intensity Supervision Program (HISP) in 21-CR-157.
2. For more than seven months, Mr. Secor has remained in compliance with the requirements of the HISP.
3. Mr. Secor has no criminal history.
4. Mr. Secor requests permission to travel within his home state of California. The address of Mr. Secor’s travel has been provided to the USAO and to U.S. Probation in the Central District of California.<sup>1</sup> Neither office has an objection to Mr. Secor’s travel request.
5. The Central District of California does request, that in the event of an unexpected malfunction with Mr. Secor’s location monitoring equipment, that he immediately report to the U.S. Probation office in Santa Ana, CA during his travel.

<sup>1</sup> Counsel is prepared to provide the address of Mr. Secor’s travel to the Court, at the November 12, 2021, status hearing.

WHEREFORE, Mr. Secor respectfully requests that his travel request be granted, and that he be permitted to travel with his family from November 19-27, 2021.

Respectfully submitted,

*/s/ Brandi Harden*

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 8, 2021, I caused a copy of the foregoing motion to be served on counsel of record via ECF.

*/s/ Brandi Harden*

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Brandi Harden, Esq.