

**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.

On November 15, 2021, Defendant moved to modify his bond conditions to allow for international travel to Haiti. ECF No. 22. On November 16, 2021, this Court granted the modification. ECF No. 25. Due to changes in travel schedule from those outlined in the previous bond modification (ECF Nos. 22 and 25), Defendant moves for the following updated bond modification:

1. Release Mr. Brooks' passport for the purpose of international travel as listed below;
2. Permit Mr. Brooks to travel internationally to Haiti to meet with Promise for Haiti and Dr. Guy Theodore for the purpose of volunteer work;
3. Permit Mr. Brooks' above referenced international travel on the following dates:
 - a. January 11, 2022, depart Fort Pierce and arrive in Pignon Haiti;
 - b. January 17, 2022, depart Pignon and return to Fort Pierce.

On December 16, 2021, Counsel for Defendant inquired regarding the government's position on modifying Defendant's bond for the purpose of international travel from January 11, 2022, through January 17, 2022. On December 16, 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 January.

On December 16, 2021, Counsel for Defendant inquired regarding Pretrial's position on modifying Defendant's bond for the purpose of international travel from January 11, 2022, through January 17, 2022. On December 16, 2021, Pretrial by and through U.S. Probation Officer Alex Le, provided that the Pretrial does not oppose Mr. Brooks' international travel to Haiti in January.

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

Respectfully submitted,

CUAUHTEMOC ORTEGA
Federal Public Defender

DATED: December 16, 2021

By */s/ Jonathan K. Ogata*

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