

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

UNITED STATES OF AMERICA

Plaintiff,

v.

EDUARDO ALVEAR GONZALEZ,

Defendant.

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Case Number: 21-cr-0115 CRC

MOTION TO MODIFY CONDITIONS OF RELEASE
(Permission to Travel Outside the United States)

EDUARDO GONZALEZ, through his court-appointed attorney, Anthony D. Martin, moves for permission to travel to England, during the period December 18th, 2021 to January 2nd, 2022. The government opposes the request and the United States Pre-trial Services Office has not responded to counsel's query on whether they have any objections.

Procedural Posture

Mr. Gonzalez sentencing is scheduled for January 5th, 2022 at 10:00 am.

Background Information

Mr. Gonzalez was charged by information on February 11th, 2021 with several offenses including: Entering and Remaining in a Restricted Building or Grounds in violation of 18 USC §1752(a)(1); Disorderly and Disruptive Conduct in a Restricted Building or Grounds in violation of 18 USC §1752(a)(2); Disorderly Conduct in a Capitol Building in violation of 40 USC §5104(e)(2)(D) and Parading, Demonstrating or Picketing in a Capitol Building in violation of 40 USC §5104(e)(2)(G). He was arrested on or about January 31st, 2021. He was released with High Intensity Supervision on March 24th, 2021.

Basis for Request

Mr. Gonzalez has been invited by a friend to spend the Holiday Season, at no cost in London, England. It is an opportunity that doesn't present itself very often.

Prayer

WHEREFORE, the Defendant respectfully requests that he be permitted to travel to England on December 18th, 2021 and return to the United States on January 2nd, 2022.

Respectfully submitted,
ANTHONY D. MARTIN

By: /s/
Anthony D. Martin, 362-537
GREENWAY CENTER OFFICE PARK
7474 Greenway Center Drive, Ste 150
Greenbelt, MD 20770
(301) 220-3700; (301) 220-1625(fax)

Attorney for Eduardo Gonzalez

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing MOTION TO MODIFY CONDITIONS OF RELEASE TO PERMIT OCONUS TRAVEL, was sent electronically on the date appearing below to:

Troy A. Edwards, AUSA
United States Attorney's Office
555 4th Street, NW
Washington, DC 20001

On this Wednesday, November 03, 2021

By: /s/ Anthony D. Martin

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ORDER

(Permission to Travel Outside the United States)

This matter is before the court on a motion filed by EDUARDO GONZALEZ, through his court-appointed counsel. Mr. Gonzalez seeks permission to travel to England, during the period December 18th, 2021 to January 2nd, 2022. The government opposes the request and the United States Pre-trial Services Office has not responded to counsel's query on whether they have any objections.

After having reviewed the record as a whole and noting the government's objection, IT APPEARS TO THE COURT, that no good reasons has been presented by the government to deny the request.

WHEREFORE, IT IS ORDERED this _____ day of November, 2021 that the request be and is HEREBY GRANTED. IT IS further ORDERED that Mr. Gonzalez is permitted to travel to England no sooner than December 18th, 2021 and return to the United States no later than January 2nd, 2022.

JUDGE

cc:

Troy A. Edwards, AUSA

United States Attorney's Office
555 4th Street, NW
Washington, DC 20001

Anthony D. Martin, 362-537

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