

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

GLENN ALLEN BROOKS

Defendant.

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

**MOTION TO MODIFY CONDITIONS
OF RELEASE TO PERMIT
INTERNATIONAL TRAVEL**

COMES NOW, Glenn Allen Brooks, through counsel, Joseph R. Conte, to respectfully request this honorable court to amend his conditions of release to permit him to travel to Pignon Haiti for humanitarian purposes from February 17, 2022 to February 22, 2022. As grounds for this motion counsel would state:

1. The defendant is on release and prohibited from international travel absent leave of the court.
2. The defendant wishes to travel to Pignon, Haiti for humanitarian purposes from February 17 to February 22, 2022.
3. The court previously granted the defendant's first motion for travel to Haiti and that trip ended without incident.
4. Undersigned has spoken to government counsel who has advised counsel that the government takes no position with respect to this motion.

United States v. Glenn Allen Brooks
Case #1:21-cr-00503-RCL-1
Motion to Modify Conditions of Release to Permit
International Travel
Page No. 1

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WHEREFORE counsel respectfully requests that this motion be granted.

Dated: January 27, 2022

Respectfully submitted,

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