

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

**THIRD 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 March 29, 2022 to April 7, 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 March 29, 2022 to April 7, 2022.
3. The court previously granted the defendant's prior two motions for travel to Haiti and those trips 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.

WHEREFORE counsel respectfully requests that this motion be granted.

Dated: March 4, 2022

Respectfully submitted,

Joseph R. Conte, Bar #366827
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