

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

**REPLY TO GOVERNMENT'S
RESPONSE TO DEFENDANT'S
MOTION TO MODIFY CONDITIONS
OF RELEASE**

Glenn Allen Brooks, through counsel, Joseph R. Conte, respectfully submits this reply to the government's response to defendant's motion to modify conditions of release. (Dkt. #42).

Mr. Brooks requires firearms for personal protection. He has a history of moving very expensive tools and materials for his profession as a General Contractor. These tools and materials are easily disposed of in sales of illegal stolen goods. As a result of this the State of California issued a concealed carry permit to him in 2015 to ward off the risk of robbery. That risk has not abated. Mr. Brooks was issued a concealed carry permit in 2014 when he was working in that state as a General Contractor for the same reason. Presently Mr. Brooks is doing humanitarian work in Haiti where there is considerable risk of kidnaping and other violent crimes. Carrying a firearm greatly reduces the risk for him and those accompanying him.

Finally, the risk "where Pretrial Services officers conduct home visits." (Gov't response at 6) is small or nonexistent. Since his release on September 1, 2021, Pretrial Services have yet to conduct a home visit and Mr. Brooks has

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absolutely no animus to Pretrial Services and has gone so far as to invite them to a home visit.

WHEREFORE counsel respectfully requests that his motion be granted.

Dated: March 4, 2022

Respectfully submitted,

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