

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, :  
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 v. : Cr. No. 21-cr-00176 (CJN)  
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 STEVE OMAR MALDONADO, :  
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 Defendant. :  
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**UNOPPOSED MOTION TO TEMPORARILY ALLOW TRAVEL**

Mr. Steve Maldonado, through undersigned counsel, respectfully submits this motion to allow travel outside the continental United States, specifically to Puerto Rico, and as grounds therefore states:

1. On February 8, 2021, Mr. Maldonado was charged by criminal complaint with Entering and Remaining on Restricted Buildings or Grounds, in violation of 18 U.S.C. § 1752(a)(1) and (2); and Violent Entry or Disorderly Conduct, and Parading, Demonstrating, or Picketing in a Capitol Building, in violation of 40 U.S.C. § 5104(e)(2)(D) and (G). *See* ECF No. 1.
2. On February 12, 2021, Mr. Maldonado appeared in the U.S. District Court of the District of Columbia for an initial appearance. At that hearing, Magistrate Meriweather released Mr. Maldonado on his personal recognizance subject to the following conditions: weekly check-ins with Pretrial Services in D.C., surrender of his passport, notification to Pretrial Services in advance of any travel outside the Middle District of Florida,

- court approval for all travel outside the continental U.S., and a stay-away from the District of Columbia, among others. *See* ECF No. 5.
3. On March 3, 2021, a federal grand jury indicted Mr. Maldonado on the previously listed misdemeanor charges, and also a felony charge of Obstructing an Official Proceeding, in violation of 18 U.S.C. § 1512(c)(2), and Aiding and Abetting the same, in violation of 18 U.S.C. § 2. *See* ECF No. 9.
  4. Since that time, the parties have participated in telephonic status conferences where it was explained that discovery and disposition negotiations were ongoing. Defense counsel has file a motion to dismiss the obstruction count. Mr. Maldonado's next telephonic status conference is scheduled for November 29, 2022.
  5. Mr. Maldonado resides in Florida. He has remained compliant with his release conditions. He has business and family Puerto Rico and needs to make frequent extended visits there both to manage his business and visit his daughter and grandchildren. This Court has previously permitted his travel to Puerto Rico and his trips have occurred without incident. *See e.g.*, Minute Orders, March 30, 2021, and August 23, 2021 (granting motions to travel to Puerto Rico).
  6. Mr. Maldonado needs to travel to Puerto Rico on November 30, 2022 to January 30, 2023. If permitted to travel to Puerto Rico, Mr. Maldonado will be able to attend all video teleconferences and in-person hearings set by

this Court just as if he were in Florida.

7. Additionally, undersigned has consulted with the U.S. Probation Office and government counsel, and can represent that the government does not oppose provided U.S. Probation does not oppose. It is counsel understanding that Probation has no objection as long as the Court permits the requested travel.<sup>1</sup>
8. Therefore, Mr. Maldonado requests that this Court allow him special permission to fly and stay in Puerto Rico for approximately six (6) weeks manage his business and visit his daughter and grandchild.

Respectfully submitted,

A.J. KRAMER  
FEDERAL PUBLIC DEFENDER

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<sup>1</sup> The U.S. Probation Office has previously requested that if Mr. Maldonado is granted this request, he must continue to report weekly, just as if he were in Florida.