

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  
(FOURTH REQUEST)**

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 May 10, 2022, to May 19, 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 May 10, 2022, to May 19, 2022.
3. The court has previously granted the defendant's first and second and third motions for travel to Haiti and those trips ended without incident.
4. The government has previously advised that they have no position with respect to the defendant's international travel.

*United States v. Glenn Allen Brooks*  
Case #1:21-cr-00503-RCL-1  
Motion to Modify Conditions of Release to Permit  
International Travel (Third Request)  
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WHEREFORE counsel respectfully requests that this motion be granted.

Dated: April 3, 2022

Respectfully submitted,

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