

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 FOR LEAVE TO  
WITHDRAW AS COUNSEL**

COMES NOW, Joseph R. Conte, counsel for Glenn Allen Brooks to respectfully request leave of this honorable court to withdraw as counsel for the defendant. As grounds for this motion counsel would state:

1. The defendant is charged with violations of 18 U.S.C. § 1752(a)(1) - Knowingly Entering or Remaining in any Restricted Building or Grounds Without Lawful Authority, 18 U.S.C. §1752(a)(2) – Disorderly and Disruptive Conduct in a Restricted Building, 40 U.S.C. § 5104(e)(2)(D) - Violent Entry and Disorderly Conduct on Capitol Grounds, 40 U.S.C. §5104(e)(2)(G) – Parading, Demonstrating, or Picketing in a Capitol Building.

2. Undersigned counsel entered his appearance in this matter on January 26, 2022.

3. A trial date has not been established.

4. Undersigned counsel and the defendant no longer enjoy a genuine attorney-client relationship; the crucial elements of trust and confidence by and

*United States v. Glenn Allen Brooks*, Case No. 1:21-cr-00503-RCL-1

Motion for Leave to Withdraw as Counsel  
Page -1-

WITHDRAW 22/04/13 08:26:07

Joseph R. Conte  
Law Office of J.R. Conte  
400 Seventh St., N.W., #206  
Washington, D.C. 20004  
Phone: 202.638.4100  
Email: dcgunlaw@gmail.com

between this lawyer and defendant have been eroded beyond the point where the relationship may be satisfactorily restored.

5. Counsel submits that granting leave to withdraw as counsel will not prejudice the parties or the Court, and/or otherwise will be in the interests of justice.

WHEREFORE counsel respectfully requests that his motion be granted.

Dated: April 13, 2022

Respectfully submitted,

---

Joseph R. Conte  
Counsel for Glenn Allen Brooks  
Law Office of J.R. Conte  
400 Seventh St., N.W., #206  
Washington, D.C. 20004  
Phone: 202.638.4100  
Fax: 202.628.0249  
Email: [dcgunlaw@gmail.com](mailto:dcgunlaw@gmail.com)

<p><i>United States v. Glenn Allen Brooks</i>, Case No. 1:21-cr-00503-RCL-1</p> <p>Motion for Leave to Withdraw as Counsel Page -2-</p> <p>WITHDRAW 22/04/13 08:26:07</p>		<p>Joseph R. Conte Law Office of J.R. Conte 400 Seventh St., N.W., #206 Washington, D.C. 20004 Phone: 202.638.4100 Email: <a href="mailto:dcgunlaw@gmail.com">dcgunlaw@gmail.com</a></p>
---	--	--

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was served on the defendant, Glenn Allen Brooks by electronic mail at [glen2ns@gmail.com](mailto:glen2ns@gmail.com) this 13<sup>th</sup> day of April 2022.

---

Joseph R. Conte

<p><i>United States v. Glenn Allen Brooks</i>, Case No. 1:21-cr-00503-RCL-1</p> <p>Motion for Leave to Withdraw as Counsel Page -3-</p> <p>WITHDRAW 22/04/13 08:26:07</p>		<p>Joseph R. Conte Law Office of J.R. Conte 400 Seventh St., N.W., #206 Washington, D.C. 20004 Phone: 202.638.4100 Email: <a href="mailto:dccgunlaw@gmail.com">dccgunlaw@gmail.com</a></p>
---	--	--