

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

United States of America)
)
 v.) USDC No. 21-cr-503 (RCL)
 Glenn Allen Brooks,)
 defendant.)

MOTION TO PERMIT TRAVEL

Defendant, through undersigned counsel Nathan I. Silver, II, Esq. (“counsel”), appointed by this Court under the Criminal Justice Act, respectfully moves the Court to permit defendant’s travel to and from Haiti, during the period (inclusive) from February 21 to March 3, 2023. The reasons follow

1. Defendant is charged in a four-count criminal information with misdemeanor offenses the government alleges he committed on January 6, 2021, at the United States Capitol. Those offenses are Entering and Remaining in a Restricted Building or Grounds; Disorderly and Disruptive Conduct in a Restricted Building or Grounds; Disorderly Conduct in a Capitol Building; and Parading, Demonstrating, or Picketing in a Capitol Buildings, violations of 18 U.S.C. §§ 1752(a)(1) and (a)(2), and 40 U.S.C. §§5104(e)(2)(D) and (e)(2)(G).

2. The defendant participates in a faith-based mission in Haiti to improve the delivery of electricity to farmland on the island. The mission is installing solar panels to collect energy that can be used in an electrical grid. This grid will supply energy to the agricultural community and replace one that currently operates on diesel fuel, which has become ever more costly.¹ He advises that he provides volunteer services with a hospital on the island.

¹ Counsel obtained this information from Omer Shedd, M.D., active in the mission, known as Promise for Haiti, who was instrumental in attracting the defendant to participate in the group’s efforts to supply electricity to this area in Haiti. Dr. Shedd is a cardiologist in the field of electrophysiology. His bio may be found at: <https://www.hendrix.edu/odysseymedal/default.aspx?id=76674>

3. The defendant has made previous visits to Haiti, with the Court's permission, and they have been without incident. He has complied with the Court's conditions of travel specifically and the conditions of his release generally.

4. The defendant has demonstrated his reliability and absence of flight risk not only by adhering to previous Orders of this Court per his travel plans but also by appearing in-person for his hearings in the instant case, unusual for defendants in January 6 cases, most of whom live outside the D.C. Metropolitan area and elect to appear remotely.

5. The defendant brings this request to the Court now instead of doing so orally at the next status hearing, set for February 13, 2023, at 12:30 p.m., because of the need to make advance arrangements for flights and accommodations. It will be much more costly to make the arrangements were he to wait until February 13, 2023, in the event the Court granted his request.

5. The government informed the defendant, through counsel, that it believes that this request should be taken up at the next hearing, given the uncertainty about the defendant's legal representation.²

6. For the reasons stated above, the defendant urges the Court to permit the defendant's travel to and from Haiti, during the period from February 21 to March 2, 2023.

A proposed Order is attached.

WHEREFORE, the defendant respectfully moves the Court to grant said relief.

This pleading is,

Respectfully submitted,

/s/

² The defendant moved the Court for the appointment of new counsel at the last hearing. The Court said it would address that issue at the next hearing, which it set for February 1, 2023, then continued at the defendant's request to Feb. 13, 2023.

NATHAN I. SILVER, II
Unified Bar #944314
6300 Orchid Drive
Bethesda, MD 20817
(301) 229-0189 (direct)
(301) 229-3625 (fax)
email: nisquire@aol.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing pleading has been served via ECF on Joseph S. McFarlane, Esq., DOJ-Criminal Division, 1400 New York Avenue, N.W., Washington, D.C., 20530, attorney of record for the United States, this 2nd day of February, 2023.

/s/

Nathan I. Silver, II