

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

)	
)	
UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Case No.: 1:21-mj-00438
)	
vs.)	
)	
)	
ADAM WEIBLING,)	
)	
Defendant.)	
)	

**UNOPPOSED MOTION BY DEFENDANT ADAM WEIBLING
FOR APPROVAL OF IMPENDING TRAVEL
PURSUANT TO HIS CONDITIONS OF RELEASE ON BOND**

Defendant Adam Weibling, by and through the undersigned counsel Bruce H. Searby, hereby moves unopposed for this Court to approve of his travel outside the Continental United States to a United States territory, as required by his conditions of release in this case, and in support thereof states the following:

1. On May 5, 2021, weeks previous to his arrest in this misdemeanor case, Mr. Weibling booked and pre-paid for vacation travel plans with his wife (Brittney Weibling) for round-trip travel to the U.S. Virgin Islands from their home in the State of Texas, for eight days beginning on June 12, 2021. Attached as Exhibit A hereto is a screenshot copy of the electronic confirmations of that May 5th purchase.

2. On May 25, 2021, Mr. Weibling was arrested in Texas on a sealed warrant in this case issued pursuant to a Criminal Complaint for misdemeanor violations of Title 18, United States Code, Section 1752(a)(1) and (2) (knowingly entering or remaining in any restricted building or grounds without lawful authority), and Title 40, United States Code, Section 5104(e)(2)(D) and (G) (violent entry and disorderly conduct on Capitol grounds). (*See* ECF Nos. 1, 5.) These charges related to the several hundred, if not more, persons who entered the grounds of the United States Capitol during a disturbance on January 6, 2021 (“the January 6th U.S. Capitol Matter”). Mr. Weibling, who is not charged with any kind of violent assault on an officer, destruction of government property, looting, or conspiracy in connection with the January 6th U.S. Capitol Matter, was subsequently released on a \$50,000 unsecured appearance bond in the Southern District of Texas.
3. On June 3, 2021, Mr. Weibling made his initial appearance in this Court, and his release on bond was continued pursuant to a new set of standard conditions in this District as well as a special condition relating to travel to the District of Columbia for defendants in the January 6th U.S. Capitol Matter. (*See* ECF No. 8.) His conditions require court approval for any travel outside the "Continental" United States.

4. Mr. and Mrs. Weibling's travel plans to the U.S. Virgin Islands are for within United States territory, but outside the Continental United States, with **departure at the end of this week on Saturday, June 12, 2021, and a return flight on June 20th**, as shown on the airline ticketing confirmation at Exhibit A.
5. Mr. Weibling has waived a preliminary hearing and has consented to the exclusion of time under the Speedy Trial Act, and a Status Conference in this matter has been set for July 29, 2021. (*See* 06/03/2021 Minute Entry.) Accordingly, the proposed travel would not interfere with Mr. Weibling's participation in any court proceedings.
6. Mr. Weibling has filed this time-sensitive request at the earliest opportunity after consulting with the Assistant US Attorney assigned to the matter (Ms. Graciela Lindberg), and with a responsible supervisory official of the U.S. Pretrial Services Agency in this District (Ms. Takeysha Robinson). Undersigned counsel provided the travel confirmation at Exhibit 1 to both the Government and to PSA. The AUSA responded that the Government would not oppose Mr. Weibling's request for approval of these plans. PSA responded this past weekend that it defers to the Court on this request for approval. Therefore, neither the Government nor PSA are opposed to this motion.

WHEREFORE, Mr. Weibling respectfully requests that this Court GRANT his unopposed motion for approval of his impending travel plans.

Dated this 7th day of June, 2021 Respectfully submitted,

/s/ Bruce H. Searby
Bruce H. Searby (DC #1012382)
SEARBY LLP
1627 Connecticut Ave, NW, Suite #4
Washington, D.C. 20009
Tel: (202) 750-6106
bsearby@searby.law

COUNSEL FOR DEFENDANT
ADAM WEIBLING

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of June, 2021, true and genuine copies of UNOPPOSED MOTION BY DEFENDANT ADAM WEIBLING FOR APPROVAL OF IMPENDING TRAVEL PURSUANT TO HIS CONDITIONS OF RELEASE ON BOND were served via electronic mail by this Court's CM/ECF system, which will serve a copy on all counsel of record.

Respectfully submitted,

/s/ Bruce H. Searby
Bruce H. Searby, DC Bar No. 1012382
SEARBY LLP
1627 Connecticut Ave, NW, Suite #4
Washington, D.C. 20009
Tel: (202) 750-6106
bsearby@searby.law

EXHIBIT A



Spirit Airlines May 4



to me ▾

spirit

HOTEL CAR TRIPS PARTNERS

Regardless of local or state ordinances, airlines and airports remain subject to federal law requiring Guests to wear an appropriate face covering at airports and on flights. Children under the age of 2 years old are exempt. There may be other limited exceptions for a Guest who meets certain criteria. Please [click here](#) to view the full Face Covering Policy.

Thank you for choosing Spirit Airlines. This notice contains information to be used during your travels. Please review the contents of this document carefully. For your convenience, please print a copy to take with you on your trip.

Please do not reply to this email. The reply email address is used solely for outgoing email documents.

YOUR CONFIRMATION CODE XETN5Z

Booking Date Wednesday, May 05, 2021

Flight

SATURDAY, JUNE 12, 2021	TIME	DURATION
Houston, TX	7:05 AM	02 h 35 min
Fort Lauderdale, FL	10:40 AM	
FLIGHT	TERMINAL	
2909	A	

Change Aircraft

SATURDAY, JUNE 12, 2021	TIME	DURATION
Fort Lauderdale, FL	12:38 PM	02 h 52 min
St. Croix, US Virgin Islands	3:30 PM	
FLIGHT	TERMINAL	
438	4	

Fort Lauderdale to Houston BK 257
May 20, 8:55 AM - Jun 20, 11:41 AM

Spirit Airlines May 12
to me

spirit
HOTEL CAR TRIPS PARTNERS

Regardless of local or state ordinances, airlines and airports remain subject to federal law requiring Guests to wear an appropriate face covering at airports and on flights. Children under the age of 2 years old are exempt. There may be other limited exceptions for a Guest who meets certain criteria. Please [click here](#) to view the full Face Covering Policy.

Thank you for choosing Spirit Airlines. This notice contains information to be used during your travels. Please review the contents of this document carefully. For your convenience, please print a copy to take with you on your trip.

Please do not reply to this email. The reply email address is used solely for outgoing email documents.

YOUR CONFIRMATION CODE PGFFUW

Booking Date Wednesday, May 05, 2021

Flight

	TIME	DURATION
SUNDAY, JUNE 20, 2021	5:15 PM	02 h 52 min
St. Thomas, Virgin Islands	8:07 PM	
Fort Lauderdale, FL		
FLIGHT	TERMINAL	
1247		

----- Change Aircraft -----

	TIME	DURATION
SUNDAY, JUNE 20, 2021	9:55 PM	02 h 45 min
Fort Lauderdale, FL	11:40 PM	
Houston, TX		
FLIGHT	TERMINAL	
257	4	

Please be aware that flight times are subject to change. Notification of schedule changes will be sent to the email address provided at the time of booking.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

)	
)	
UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Case No.: 1:21-mj-00438
)	
vs.)	
)	
)	
ADAM WEIBLING,)	
)	
Defendant.)	
)	

[PROPOSED] ORDER FOR APPROVAL OF IMPENDING TRAVEL
PURSUANT TO CONDITIONS OF RELEASE ON BOND

The Court has reviewed Defendant Adam Weibling’s unopposed motion for approval of travel outside of the Continental United States. Upon consideration of that motion, and for the reasons stated therein, the Court GRANTS the approval for travel to the United States Virgin Islands between the dates of June 12, 2021 and June 20, 2021.

IT IS SO ORDERED.

DATED:

United States Magistrate Judge