

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

STEVE OMAR MALDONADO,

Defendant.

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Cr. No. 21-cr-00176 (CJN)

MOTION TO TEMPORARILY ALLOW TRAVEL

Mr. Steve Maldonado, through undersigned counsel, respectfully submits this motion to temporarily 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 Parade, Demonstrate, or Picket on Capitol Grounds 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 February 23, 2021, Mr. Maldonado submitted a motion for temporary travel to Puerto Rico so he could facilitate the settling and liquidation of his recently deceased father's assets. *See* ECF No. 7.
4. On March 3, 2021, Magistrate Meriweather granted Mr. Maldonado's motion for temporary travel. *See* Minute Order (Mar. 3, 2021).
5. Also 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.
6. Since that time, the parties have participated in two status conferences where it was explained that discovery and disposition negotiations were ongoing. *See* Minute Entries May 13, 2021 & Jul. 13, 2021). A next status conference is scheduled for September 14, 2021.
7. On July 26, 2021, Mr. Maldonado has entered into a contract with Shalom Realty De Puerto Rico, LLC, to facilitate the sale of his deceased father's home. *See* Ex. A.
8. However, to complete the sale, he needs to be physically present in the country to close on the home and make some repairs to the bathrooms.
9. According to the terms of the contract, Mr. Maldonado has 60 days to physically close on the home, expiring on September 22, 2021. *See* Ex. A.
10. Therefore, Mr. Maldonado requests that he be able to travel temporarily to Puerto Rico for a period of two (2) weeks to close on his deceased father's home and repair the bathrooms.
11. Undersigned counsel has reached out to the government and pretrial services for their

position. The government's position is as follows:

It appears that "(1) defendant has no criminal history leading to scoring in Sentencing Guidelines; (2) defendant went and returned on previous trip without issue; and (3) defendant has been in full compliance with pretrial conditions these last several months. Assuming you (Ms. Halverson and Pretrial) can confirm [this information] regarding Mr. Maldonado, and Pretrial can obtain a copy of round-trip ticket before his departure, the government will not oppose [requested] travel."

12. As of today, Pretrial Services has not responded to undersigned counsel's requests for its position. However, Mr. Maldonado has no issue providing Pretrial Services a copy of his round-trip ticket before departure.¹
13. Therefore, Mr. Maldonado requests that this Court allow him special permission to fly and stay in Fajardo, Puerto Rico for 14 days to conclude his father's estate.

Respectfully submitted,

A.J. KRAMER
FEDERAL PUBLIC DEFENDER

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¹ Mr. Maldonado has not yet booked his air ticket for travel. However, if the motion is granted, he will take special care to ensure that his travel dates do not interfere with the currently scheduled status conference set for September 14, 2021.