

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)

**UNOPPOSED 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 Parading, Demonstrating, or Picketing in a Capitol Building, 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 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. *See* ECF No. 9.
4. Since that time, the parties have participated in telephonic status conferences where it was explained that discovery and disposition negotiations were ongoing. Mr. Maldonado's next telephonic status conference is scheduled for February 2, 2022 at 10:30 a.m.
5. Mr. Maldonado, who has remained compliant with his release conditions, owns a rental property and has a daughter that resides in Puerto Rico.
6. As part of his duty to manage his rental property effectively, Mr. Maldonado requires regular visits to complete the unit's necessary repairs.
7. Additionally, Mr. Maldonado's daughter is due to give birth to Mr. Maldonado's granddaughter in December 2021.
8. To make the rental unit repairs and to welcome and meet his new granddaughter and help with childcare, Mr. Maldonado is requesting he be allowed to travel to Puerto Rico for three weeks, from the middle of January through the first week of February 2022.
9. Mr. Maldonado is aware of his next status conference on February 2, 2022, but he anticipates no issues in appearing for that conference telephonically while in Puerto Rico.
10. Additionally, undersigned has consulted with the U.S. Probation Office and government counsel, and can represent that neither the government nor U.S.

Probation object to his proposed travel.<sup>1</sup>

11. Therefore, Mr. Maldonado requests that this Court allow him special permission to fly and stay in Puerto Rico for approximately three (3) weeks to welcome the birth of his new granddaughter and make repairs to his rental property in January and February 2022.

Respectfully submitted,

A.J. KRAMER  
FEDERAL PUBLIC DEFENDER

\_\_\_\_\_/s/\_\_\_\_\_  
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<sup>1</sup> The U.S. Probation Office has requested that if Mr. Maldonado is granted this request, undersigned conveys he “has to report weekly as ordered by the court while he is traveling.”