

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	:	
	:	
	:	
v.	:	Cr. No. 21-cr-00176 (CJN)
	:	
STEVE OMAR MALDONADO,	:	
	:	
Defendant.	:	
_____	:	

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. Since that time, the parties have participated in telephonic status conferences.
 4. A trial is scheduled for August 7, 2023. However, that date may be changed in light of the government's appeal of this Court's order dismissing the obstruction count. The parties are scheduled to brief the impact of the appeal on the trial date.
 5. Mr. Maldonado, who has remained compliant with his release conditions, owns a rental property and has a daughter and a grandchild that reside 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. In the long term, Mr. Maldonado plans on moving to Puerto Rico permanently.
 7. In order to manage his property and help his daughter with childcare, Mr. Maldonado needs to travel to Puerto Rico on May 5, 2023, and remain until July 1, 2023.

8. This Court has permitted Mr. Maldonado to travel to Puerto Rico several before and there have been no compliance issues. *See Minute Orders*, March 30, 2021, and August 23, 2021 (granting motions to travel to Puerto Rico). He has previously appeared for telephonic conferences from Puerto Rico.
9. Additionally, in the past, government counsel has not opposed if Probation consents. U.S. Probation does not oppose this motion and has consented in the past.¹ Counsel has reached out to the current assigned government counsel has had not received a response. However, the government has never opposed this request.
10. Therefore, Mr. Maldonado requests that this Court allow him special permission to fly and stay in Puerto Rico for approximately two months to care for his granddaughter and to manage his rental property.

Respectfully submitted,

A.J. KRAMER
FEDERAL PUBLIC DEFENDER

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¹ The U.S. Probation Office has previously 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.”