

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-498-CJN
	:	
ANDREW QUENTIN TAAKE	:	
	:	
Defendant	:	

MOTION TO FOR APPROPRIATE RELIEF

COMES NOW, the Defendant, Andrew Quentin Taake, by and through his counsel, Michael E. Lawlor, and Nicholas G. Madiou, Brennan, McKenna & Lawlor, Chtd., and files this motion for appropriate relief seeking an order of this Court moving the Defendant to a detention facility closer to Washington, D.C. In support of this motion, counsel respectfully states as follows:

1. Mr. Taake is charged with various offenses stemming from the storming of the United States Capitol on January 6, 2021.
2. Mr. Taake was arrested in the Southern District of Texas and was held without bond. Mr. Taake made his initial appearance in this Court on October 6, 2021 and was ordered to remain detained pending trial in this matter.
3. Thereafter, Mr. Taake was originally held in this District in the D.C. Central Detention Facility. Mr. Taake was then transferred to the United States Penitentiary, in Lewisburg, Pennsylvania.
4. Undersigned counsel respectfully files this Motion with the Court

seeking an Order of appropriate relief transferring Mr. Taake either back to the D.C. Department of Corrections or a detention center closer to the District of Columbia.

5. Undersigned counsel makes this request to ensure Mr. Taake's rights under the Sixth Amendment are secured. Mr. Taake's incarceration in a maximum-security U.S. penitentiary infringes his right to communicate with counsel, and access the discovery provided by the Government in this case.

6. The defendant's access to undersigned counsel during this pre-trial phase is made more difficult by the distance between counsel and the defendant. Housing the Defendant in a location in this District or closer to this District will permit undersigned counsel more regular contact with Mr. Taake as he seeks to review discovery and decide whether to resolve this case short of trial or, in the alternative to mount a defense to the charges now pending before him.

7. For these reasons, and those that may be addressed in open Court at the upcoming Status Conference on May 11, 2022, undersigned counsel requests that this Court order Mr. Taake be detained at a location in this District.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 10, 2022, a copy of the foregoing was sent to the United States Attorney's Office for the District of Columbia, via ECF.

/s/

Michael E. Lawlor