

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

UNITED STATES OF AMERICA

v.

MATTHEW LOGANBILL,

Defendant.

Crim. Action No. 1:21CR593

**CONSENT MOTION FOR VIDEO TESTIMONY OF DEFENSE
WITNESSES**

Matthew Loganbill, through counsel, respectfully requests that the Court permit two of his defense witnesses, Kenneth and Kirk Broyles, to testify by video teleconference during the currently scheduled bench trial beginning on August 22, 2023.

Mr. Loganbill has disclosed these anticipated witnesses to government counsel and has provided a brief synopsis of their anticipated testimony. Kenneth and Kirk Broyles are brothers and traveled to D.C. with Mr. Loganbill to attend the Stop the Steal rally. They will each provide brief testimony.

The Broyles lived in rural Missouri. They are both hourly wage earners and do not get paid if they do not work. To travel to the district to testify, they would lose at least two days of work, which would constitute a financial hardship for both of them. Furthermore, permitting the witnesses to testify by video will obviate the need for the U.S. Marshal Service to arrange and pay for their travel. This request is

particularly reasonable because this will be a short bench trial. Permitting the witnesses to testify by video will be the most efficient way to ensure their testimony while conserving the court's resources. Indeed, this request was recently granted in another January 6 bench trial, *United States v. Sturgeon*, 21CR91(RCL).

Conclusion

For these reasons, Mr. Loganbill respectfully requests that the Court allow two defense witnesses to testify by video teleconference. The government consents to this request.

Respectfully submitted,

A. J. KRAMER
FEDERAL PUBLIC DEFENDER

/s/

Elizabeth Mullin
Assistant Federal Public Defender
625 Indiana Avenue, N.W., Suite 550
Washington, D.C. 20004
(202) 208-7500