

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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)	
UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Case No.: 1:21-cr-00644-RDM
)	
vs.)	
)	
)	
ADAM WEIBLING,)	
)	
Defendant.)	
)	

**UNOPPOSED MOTION BY DEFENDANT ADAM WEIBLING
FOR APPROVAL OF IMPENDING TRAVEL
UNDER HIS CONDITIONS OF RELEASE ON BOND**

Defendant Adam Weibling, by and through the undersigned counsel Bruce H. Searby, hereby moves unopposed for this Court to approve of his travel to the District of Columbia, consistent with his conditions of release in this case, and in support thereof states the following:

1. On Friday July 1, 2022, this Court entered a minute order stating that:
“Upon consideration of the parties' joint status report, Dkt. [33], it is hereby ORDERED that (1) the parties shall appear for a plea hearing on July 14, 2022, at 2:00 p.m. in Courtroom 8.” While the Court made available to Mr. Weibling the option of appearing virtually, Mr.

Weibling has chosen instead to appear in person to enter his guilty plea in the presence of the Court and his counsel.

2. The charges in this case relate to the several hundred, if not more, persons who entered the grounds of the United States Capitol during a disturbance on January 6, 2021 (“the January 6th U.S. Capitol Matter”). Mr. Weibling, who is not charged with any kind of violent assault on an officer, destruction of government property, looting, or conspiracy in connection with the January 6th U.S. Capitol Matter, was subsequently released on a \$50,000 unsecured appearance bond in the Southern District of Texas.
3. On June 3, 2021, Mr. Weibling made his initial appearance in this Court, and his release on bond was continued pursuant to a new set of standard conditions in this District as well as a special condition relating to travel to the District of Columbia for defendants in the January 6th U.S. Capitol Matter. (*See* ECF No. 8(f).) His conditions permit travel to the District of Columbia for court appearances and meetings with his counsel and Pretrial Services Administration.
4. To attend his plea hearing in person, Mr. Weibling has made plans to fly from Houston, Texas on Wednesday, July 13, 2022, and to return Thursday evening, July 14, 2022.
5. The U.S. Transportation Security Agency has on prior occasion since this case began delayed Mr. Weibling for considerable lengths of time

at the airport apparently on account of his name being on a national list as a result of these charges. To address any doubt by the TSA at the airport that he is authorized to travel to DC on this occasion, Mr. Weibling requests this order approving his travel.

6. Counsel for Mr. Weibling has filed this request after consulting with the Assistant US Attorney assigned to the matter (Ms. Graciela Lindberg). The AUSA responded that the Government would not oppose Mr. Weibling's request for approval of these plans.
7. Counsel has also asked PSA for its position, and PSA responded that it does not oppose the request. Mr. Weibling has had no issues of non-compliance with his bond conditions.

WHEREFORE, Mr. Weibling respectfully requests that this Court GRANT his unopposed motion for approval of his impending travel plans.

Dated this 10th day of July, 2022 Respectfully submitted,

/s/ Bruce H. Searby _____
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COUNSEL FOR DEFENDANT
ADAM WEIBLING

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of July, 2022, true and genuine copies of UNOPPOSED MOTION BY DEFENDANT ADAM WEIBLING FOR APPROVAL OF IMPENDING TRAVEL UNDER TO HIS CONDITIONS OF RELEASE ON BOND were served via electronic mail by this Court's CM/ECF system, which will serve a copy on all counsel of record.

Respectfully submitted,

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