

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

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|--------------------------|---|------------------------------|
| UNITED STATES OF AMERICA | : | |
| | : | |
| v. | : | Criminal No. 21-CR-178 (APM) |
| | : | |
| JEFFREY BROWN, | : | |
| Defendant. | : | |

**DEFENDANT JEFFREY BROWN'S UNOPPOSED
MOTION TO MODIFY A CONDITION OF RELEASE**

COMES NOW the Defendant, Jeffrey Brown, through counsel, and respectfully moves this Court to modify a condition of his release to permit Mr. Brown to access a legal research website for the purpose of assisting in his defense in connection with his case. In support of this Motion, Mr. Brown states the following:

Background

The Government arrested Mr. Brown in October of 2021 at his residence in California on a criminal complaint alleging Inflicting Bodily Injury on Certain Officers (18 U.S.C. § 111(a) and (b)); Civil Disorder (18 U.S.C. § 231(a)(3)); Entering and Remaining in a Restricted Building or Grounds, Disorderly and Disruptive Conduct in a Restricted Building or Grounds, and Engaging in Physical Violence in a Restricted Building or Grounds (18 U.S.C. § 1752(a)(1), (2), and (4)); Disorderly Conduct on Capitol Grounds, Impeding Passage Through the Capitol Grounds or Buildings, and an Act of Physical Violence in the Capitol Grounds or Buildings (40 U.S.C. § 5104(e)(2)(D), (E), and (F)). (ECF No. 1.) Superseding indictments followed, alleging substantially the same claims. (ECF No. 42, 63.)

Mr. Brown was held without bond from September 7, 2021, until this Court granted Mr. Brown conditional release July 21, 2022. (ECF No. 108.) Mr. Brown has remained fully

compliant with all terms of his release. Trial is scheduled to begin on November 1, 2022.

Argument

In the July 21, 2022, Order Setting Conditions of Release, Additional Conditional of Release (t) provides, in part, that Mr. Brown may not have “access to the internet or internet capable devices except to review discovery and communicate with counsel.” (ECF No. 108.) In the approximately two months that Mr. Brown has been on conditional release, he has abided by all conditions. His release has allowed him to speak with Counsel and review electronic discovery.

In addition to these opportunities, Mr. Brown would like to conduct supplemental legal research related to his case, which will allow him to more meaningfully participate in his defense. Specifically, Mr. Brown has identified “casetext.com” as a legal research tool that he would like to use solely to conduct legal research related to the defense and mitigation of his case. Mr. Brown will not use this website for any other purpose.

Granting this very limited modification does not jeopardize Mr. Brown’s release and it is reasonably tailored to permitting Mr. Brown’s participation in how own defense. The Government does not oppose this request.

Conclusion

For the foregoing reasons, Defendant respectfully requests that this Court grant this unopposed motion to modify his release conditions to permit him to access www.casetext.com for the limited purpose of conducting legal research related to his defense in the case.

Date: September 26, 2022

Respectfully submitted,

Jeffrey S. Brown
By Counsel

/s/ Samuel C. Moore

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CERTIFICATE OF SERVICE

I hereby certify that a copy of Defendant's Motion to Modify Conditions of Release was served upon counsel of record through ECF on the date of filing.

/s/ Samuel C. Moore

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