

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

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 go to and from his local Department of Motor Vehicle to renew his driver's license before his trial. 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

Pursuant to the July 21, 2022, Order Setting Conditions of Release, Mr. Brown is confined to his home except for “medical necessities, court appearances, or other activities specifically approved by the court.” (ECF No. 108.) In the approximately three months that Mr. Brown has been on conditional release, he has abided by this and all other conditions. Mr. Brown is now requesting approval by the court to leave his residence to travel to and from his local DMV so that he can renew his driver’s license before his trial, which is on November 1, 2022.

Mr. Brown recently discovered that his driver’s license will expire during the trial dates. He attempted to renew his license online, but he was unable to do so because he had previously renewed online, so an in-person visit is required for this renewal. A renewed license will allow Mr. Brown to travel and otherwise provide valid proof of identification.

Granting this very limited modification does not jeopardize Mr. Brown’s release and it is necessary for Mr. Brown to be able to return home after his trial. 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 travel to and from the Department of Motor Vehicle to renew his driver’s license.

Date: October 13, 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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