

**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.	:	

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**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 (1) his local polling place in order to vote in the federal election on November 8, 2022; and (2) his local barber shop so that he can get a haircut 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, including previous limited Court-approved modifications. Trial is scheduled to begin on November 22, 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 more than 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 (1) his local polling location so that he may vote in the November 8, 2022, election; and (2) his local barber so that he may get a haircut before his trial later this month. As a U.S. citizen who is eligible to vote, Mr. Brown would like to exercise this constitutional right. Mr. Brown would also like the opportunity to appear properly groomed when his jury trial begins on November 22, 2022.

Granting these limited modifications does not jeopardize Mr. Brown’s release. 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 his local polling place on November 8, 2022, and his local barber prior to November 22, 2022.

Date: November 4, 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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