

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

UNITED STATES OF AMERICA)
)
 v.) CASE NO. 1:21-cr-00537-2 (JMC)
)
 JAMES GRANT)
)
 _____)

MOTION TO REQUEST DEFENDANT INSTITUTION RELOCATION

James Grant, through counsel, requests this Honorable Court recommend his move from his current place of detention to an institution closer to counsel. In support of this request, Mr Grant states:

Mr Grant is before the Court charged by Indictment with one count of: Civil Disorder in violation of 18 U.S.C. §231(a)(3), 2; two counts of Assaulting, Resisting, or Impeding Certain Offices using a Dangerous weapon, Inflicting Bodily Injury, and Aiding and Abetting in violation of 18 U.S.C. 111(a)(1) and (b) and 2; one count of Entering and Remaining in a Restricted Building or Grounds with a Deadly Weapon in violation of 18 U.S.C. 1752 (a)(1) and (b)(1)(A); one count of Disorderly and Disruptive Conduct in a Restricted Building or Grounds with a Deadly or Dangerous Weapon in violation of 18 U.S.C. 1752(a)(2) and (b)(1)(A); one count of Engaging in Physical Violence in a Restricted Building with a Deadly or Dangerous Weapon Resulting in Significant Bodily Injury and Aiding and Abetting in violation of 18 U.S.C. 1752(a)(4), (b)(1)(A), and 2; one count of Disorderly Conduct in a Capitol Building or Grounds in violation of 40 U.S.C. 5104(e)(2)(D); one count of Act of Physical Violence in the Capitol Grounds or Buildings and Aiding and Abetting in violation of 40 U.S.C. 5104(e)(2)(F) and 2; one count of Obstruction of an

Official Proceeding and Aiding and Abetting in violation of 18 U.S.C. 1512(c)(2) and 2; one count of Entering and Remaining in Certain Rooms in the Capitol Building in violation of 40 U.S.C. 5104(e)(2)(C); and one count of Parading, Demonstrating or Picketing in a Capitol Building in violation of 40 U.S.C. 5104(e)(2)(G). Trial is set for 6 March, 2023

At present, Mr Grant is detained at Northern Neck Regional Jail in Warsaw, VA. This facility is a two and a half hour drive from Washington DC where undersigned counsel is based. In order to prepare for trial in an appropriate and cost effective manner, it would aid counsel and Mr Grant immensely to have him housed in a facility close to or in Washington DC. The preferred institution would be the Correctional Treatment Facility (CTF) at 1901 E Street SE., in the District of Columbia.

Mr Grant is aware the Court does not have the power to order the U.S. Marshals to relocate Mr Grant to CTF, but a recommendation from the courts have been looked on favorably by the Marshal's service and have usually resulted in the request being honored.

For the foregoing reasons, James Grant requests this Honorable Court recommend to the U.S. Marshal's service that he be relocated to Correctional Treatment facility in Washington DC.

Respectfully Submitted,

/s/ Peter A. Cooper

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Motion to Request Defendant Institution Relocation is being filed via the Electronic Court Filing System (ECF), causing a copy to be served upon government counsel of record, this 29th day of November, 2022.

/s/ Peter A. Cooper

Peter A. Cooper