

**UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAMES BRETT

Defendant.

Case No. 22CR11

MOTION TO FOR PERMISSION TO TRAVEL ON A CAMPING TRIP

James Brett, through counsel, respectfully moves this Court for an Order permitting him to go on a camping trip with his family from October 13 to 15, 2022. He further moves for an Order allowing Mr. Brett local travel in the future, provided it is preapproved by Pre-Trial Services and Mr. Brett abides by whatever restrictions Pre-Trial requests. The government consents to each of these requests. In support of this Motion counsel states:

1. Mr. Brett is before the Court charged with various offenses related to his alleged participation in the events of January 6, 2021, at the U.S. Capitol. He was arrested on June 3, 2022, in Clearwater, Florida, where he resides.
2. The government did not seek detention in this case. As for conditions of release, the government agreed that GPS monitoring or a curfew would be appropriate. Mr. Brett elected to be monitored via GPS. Accordingly, at the initial appearance in this matter, the Honorable Magistrate Judge Faruqui issued an Order placing Mr. Brett on GPS monitoring along with other

standard conditions of release. *See* ECF. No. 67. Recently, this Court granted Mr. Brett's Motion to be placed on a curfew in lieu of GPS monitoring. *See* Minute Order, September 20, 2022.

3. Mr. Brett is 48 years old. He runs his own cleaning business. Detention was never an issue in this case. According to his probation officer, Mr. Brett has been compliant with his conditions of release.
4. Mr. Brett wishes to go on a camping trip with his family, in a rural area of Florida a few hours from his home. It is undersigned counsel's understanding that because there no provision in his release Order permitting preapproved travel, Mr. Brett would need permission from the Court to attend the camping trip because he is on a curfew.
5. Undersigned counsel has consulted with the government who in turn consulted with Pre-Trial Services. The government consents to this request and represented that Pre-Trial Services indicated that Mr. Brett is on a curfew monitored by voice identification. Pre-Trial requests that Mr. Brett provide the itinerary for the camping trip prior to departure and that the Court advise whether the curfew may be temporarily suspended during the trip as Mr. Brett will not have access to a landline.
6. Going forward, undersigned counsel moves the Court to permit Mr. Brett to travel within the continental U.S. provided the travel is preapproved by Pre-Trial Services and Mr. Brett abides by whatever restrictions Pre-Trial requests, such as providing notice and an itinerary one week in advance.

This is an Order approved in many cases in which defendants are supervised outside the District of Columbia.

7. The government consents to each of these requests.

For the reasons stated herein and any others that appear to the Court, Mr. Brett moves the Court to enter the attached Order permitting him to attend a family camping trip and permitting preapproved local travel going forward.

Respectfully submitted,

A. J. Kramer
Federal Public Defender

_____/s/_____
Elizabeth Mullin
Assistant Federal Public Defender
625 Indiana Ave NW, Suite 550
Washington, D.C. 20004
(202) 208-7500