

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA ) Criminal No. 21-CR-735  
)  
vs. )  
)  
JAMES ROBERT ELLIOTT )  
)  
Defendant. )

**CONSENT MOTION TO USE ALTERNATE ANKLE MONITOR FOR EMPLOYMENT  
REASONS AND MOTION TO TEMPORARILY SUSPEND ANKLE MONITOR FOR  
EMPLOYMENT REASONS AND MOTION TO TEMPORARILY SUSPEND ANKLE  
MONITORING FOR DEFENDANT'S HONEYMOON**

AND NOW, comes Defendant, James Robert Elliott, by and through his counsel, The Welsh Law Group LLC and James L. Welsh, III, Esquire and files the within Consent Motion to Use Alternate Ankle Monitor for Employment Reasons and Motion to Temporarily Suspend Ankle Monitoring for Defendant's Honeymoon of which the following is a statement:

1. Defendant, James Robert Elliott, is currently charged with multiple crimes as the result of the incidents that took place at the US Capitol on January 6, 2021.
2. Mr. Elliott was arrested in Illinois in December 2021.
3. Mr. Elliott has been released on a home monitoring device since December of 2021 without incident or violation.
4. Mr. Elliott is getting married on June 11, 2022. He would like to go on a honeymoon with his new bride for a few days from June 11, 2022 until the evening of June 14, 2022. He will remain in the State of Illinois and will stay at a hotel near Six (6) Flags in Illinois which is about 60 miles from his residence.
5. The terms of Mr. Elliott's release require him to be in his home each day from 10:00 p.m. until 6:00 a.m.

6. Mr. Elliott seeks to have his house arrest temporarily suspended so he can enjoy his wedding night on June 11, 2022 and then go in a brief honeymoon until the evening of June 14, 2022.

7. Mr. Elliott is not a flight risk and has not once violated the conditions of his release from December of 2021 until the present according to his pre-trial officer, James Wheatley.

8. Mr. Elliott also requests that upon his return, he be re-fitted with the small ankle monitoring system. His current GPS monitor causes substantial interference with his work boots that he is required to wear due to his job duties. His current GPS monitor causes him pain and discomfort to his left area due to chafing of his skin and rubbing against his skin and his work boots. His pre-trial officer, James Wheatley, has indicated that his return to his previous radio frequency monitoring device is acceptable.

9. Counsel for the United States consents to this Motion and has no objection to the reasonableness of these requests.

WHEREFORE, Defendant respectfully requests that this Honorable Court grant his Motion and temporarily suspend his house arrest requirement from June 11, 2022 until the evening of June 14, 2022.

Respectfully submitted,

The Welsh Law Group, LLC

By: 

James L. Welsh, III, Esquire

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JAMES ROBERT ELLIOTT	)	
	)	
Defendant.	)	

**ORDER OF COURT**

AND NOW, this \_\_\_ day of \_\_\_\_\_, 2022, upon consideration of the within Motion, it is hereby ORDERED ADJUDGED and DECREED that Defendant’s Motion is hereby granted.

Defendant’s house arrest requirement is temporarily suspended from June 11, 2022 until the evening of June 14, 2022 for his wedding and honeymoon. In addition, upon his return to house arrest on June 14, 2022 at 10:00 p.m., Defendant shall be placed on his previous radio frequency monitor to accommodate his employment.

*IT IS FURTHER ORDERED:*

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\_\_\_\_\_ J.

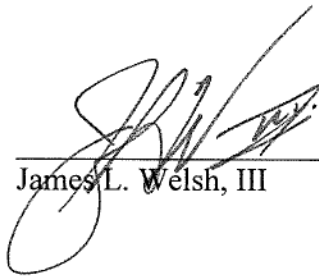
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**CERTIFICATE OF SERVICE**

I, James L. Welsh, III, Esquire, the undersigned, hereby certifies that a true and correct copy of the within *CONSENT MOTION TO USE ALTERNATE ANKLE MONITOR FOR EMPLOYMENT REASONS AND MOTION TO TEMPORARILY SUSPEND ANKLE MONITOR FOR EMPLOYMENT REASONS AND MOTION TO TEMPORARILY SUSPEND ANKLE MONITORING FOR DEFENDANT'S HONEYMOON* was sent via email this 12<sup>th</sup> day of MAY, 2022, and served upon the following:

Alexis J. Loeb, Esquire  
Assistant United States Attorney  
U.S. Department of Justice  
District of Columbia  
Judiciary Center  
555 Fourth St. NW  
Washington DC 20530

  
\_\_\_\_\_  
James L. Welsh, III