

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

LOUIS VALENTIN,

Defendant.

Case No. 21-cr-702 (JEB)

MOTION TO CONVERT IN-PERSON
HEARING TO VIDEO CONFERENCE

Mr. Louis Valentin currently has a plea hearing scheduled for February 16, 2023. The hearing is scheduled to be conducted in person. Mr. Valentin, through counsel, respectfully requests the Court convert the hearing to a video conference. The Government has represented that there is no objection to this request.

The agreement proposed by the Government is to a plea of guilty to Parading, Demonstrating, or Picketing in a Capitol Building, in violation of Title 40, United States Code, Section 5104(e)(2)(G), a misdemeanor offense. Under Federal Rule of Criminal Procedure 43(b), the Court may conduct a plea hearing by video conference when “[t]he offense is punishable by fine or by imprisonment for not more than one year, or both, and with the defendant’s written consent. . . .” Indeed, the Court may conduct the hearing “in the defendant’s absence.” *Id.*

In light of Rule 43 and given the continued risks associated with the COVID-19 pandemic and that an in-person hearing would require extensive travel for Mr. Valentin, he respectfully request the Court grant this motion and convert the

sentencing hearing to a video conference. Mr. Valentin's written consent is attached hereto.

Respectfully submitted,

A. J. Kramer
Federal Public Defender

/s/

Jose A. German
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LOUIS VALENTIN WRITTEN CONSENT

I, Louis Valentin, having discussed my right with counsel to be present at all hearings, consent to conducting the February 16 plea hearing by video conference.

Louis Valentin

Louis Valentin