

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

UNITED STATES OF AMERICA, :

v. :

Case No.: 22-CR-414 (JEB)

ANDREW JOHNSON, :

Defendant. :

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MOTION TO TRAVEL BY AIR

DEFENDANT **ANDREW JOHNSON**, through counsel, respectfully moves the Court for leave to travel and states:

1. On December 7, 2022, the Defendant was arrested and charged via a criminal complaint with four misdemeanor violations (DE:5):
 - 18 U.S.C. § 1752(a)(1) – Entering & Remaining in a Restricted Building or Grounds
 - 18 U.S.C. § 1752(a)(2) – Disorderly & Disruptive Conduct in a Restricted Building or Grounds
 - 40 U.S.C. § 5104(e)(2)(D) – Disorderly Conduct in a Capitol Building
 - 40 U.S.C. § 5104(e)(2)(G) – Parading, Demonstrating, or Picketing in a Capitol Building
2. Trial is scheduled for December 4, 2023.
3. The Court ordered Johnson released subject to certain conditions set out in the Court’s Order Setting Conditions of Release. (DE:9).
4. The Defendant wishes to travel to Connecticut to visit his brother. He will be traveling via Air and will provide his itinerary to his pretrial services officer.
5. Undersigned counsel’s assistant has communicated with Assistant U.S. Attorney, Madison

Mumma, who stated that the government defers to the Court.

6. Additionally, undersigned counsel's assistant also communicated with the pretrial services offices in Florida and Washington, D.C., and both stated that they defer to the Court on whether the requested travel should be permitted.

WHEREFORE Defendant ANDREW JOHNSON moves the Court for leave to travel.

Respectfully submitted,

/s/ David A. Howard

David A. Howard

Bar ID #FL-137

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