

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

UNITED STATES OF AMERICA

v.

SCOTT MILLER,

Defendant.

Crim. Action No.: 22CR412

**SCOTT MILLER'S EMERGENCY MOTION FOR
PERMISSION TO WORK**

Scott Miller, through counsel, respectfully submits this Motion for an Order permitting him to work at a local store. The current Order setting release conditions orders that he seek permission from the Court to “seek other employment^{1/} and or attend job interviews.” ECF. No. 19. The Court recently granted Mr. Miller’s request to attend an interview at Catoctin Furnace Liquors. Minute Order, 3/12/ 2023. Following the interview, Mr. Miller was offered a position to work at the store, assisting customers, moving store merchandise and unloading deliveries. He is scheduled to begin training next week, the week of March 28, 2023.

Mr. Miller moves for permission to work at Catoctin Furnace Liquors. He is prepared to abide by a Court Order to provide his weekly schedule to Pre-Trial Services in advance. The government does not oppose this request provided that Pre-

¹ At the time of his arrest, Mr. Miller was employed at NVR incorporated. He was terminated from NVR following his arrest in this case.

Trial Services confirms and approves the schedule in advance and Mr. Miller remain on location monitoring. In support of this Motion, counsel states:

Background

Mr. Miller is before the Court charged by Indictment with various offenses arising out of the events at the Capitol on January 6, 2021.

On December 30, 2022, the Honorable Moxila A. Upadhyaya released Mr. Miller to home incarceration. The Order setting conditions of release permits Mr. Miller to “leave his residence to go work at NVR incorporated.” If the defendant is no longer employed at NVR Incorporated, the defendant must seek permission from the Court to seek other employment and/ or attend job interviews.” ECF. No. 19. Mr. Miller is no longer employed at NVR. As the Court is aware from prior motions, Mr. Miller recently had an interview at a local liquor store. On March 22, 2022, Mr. Miller advised that he was offered a position. Accordingly, he moves the Court to permit him to work at the liquor store on a part-time basis. The Court previously approved his motion to work on a local property, also on a part-time basis. Minute Order 3/7/23.

Employment of any kind will enable Mr. Miller to use his time productively and to earn income to prepare for the birth of his first child. While it may be inappropriate for some defendants to work in a liquor store, Mr. Miller does not have issues with substance abuse that would give rise to any concern in that regard.

Wherefore the reasons stated herein and any others that appear to the Court, Mr. Miller moves the Court for an Order permitting him to work at Catoctin Furnace Liquors.

Respectfully submitted,

A. J. KRAMER
FEDERAL PUBLIC DEFENDER

/s/

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