

**SUPERIOR COURT FOR THE DISTRICT OF COLUMBIA
Criminal Division – Misdemeanor Branch**

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 2021-CMD-000193
	:	
JOSHUA KNOWLES,	:	Judge Neal Kravitz
	:	
Defendant.	:	Trial Readiness: 9/9/2022

DEFENDANT’S NOTICE OF INTENT TO PROCEED TO TRIAL REMOTELY

Joshua Knowles, by and through undersigned counsel Megan D. Allburn, respectfully declares his intent to proceed remotely in his non-jury trial scheduled before this Court on October 3, 2022. In support of this motion, Mr. Knowles states as follows:

1. Mr. Knowles is charged by information of one count of Unlawful Entry Public Property and has elected to have a bench trial on October 3, 2022.
2. The bench trial is expected to last two, possibly three, weeks as estimated by the government.
3. Mr. Knowles is a resident of Arizona and currently resides in Arizona.
4. Mr. Knowles is a small business owner of a swimming pool remodeling and service company. Mr. Knowles has five employees, who rely on his company for financial security. The business is fully operational throughout the warm seasonal months.
5. In order to be appear in person for his bench trial, Mr. Knowles will be forced to suspend his business operations with limited or no income during the time of the trial. He will need to pay for airfare from Arizona to Washington, DC, pay for transportation to and from the airport, and pay for lodging and meals for two week or the length of the bench trial. Mr. Knowles, his employees and their families would

experience a significant financial hardship if required to attend his bench trial in person for at a minimum of two weeks.

6. The government will not be prejudiced by Mr. Knowles participating in his bench trial remotely.

WHEREFORE, Mr. Knowles respectfully requests this Honorable Court to permit him to participate in his non-jury trial remotely and hereby gives the Court and the government notice of his desire to proceed in that manner.

Respectfully submitted,

/s/Megan D. Allburn

Megan D. Allburn #494462

Counsel for Joshua Knowles

503 D Street, NW Suite 300

Washington, DC 20001

Tel: 202-373-4143

MeganAllburnLaw@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the Notice of Intent to Proceed Remotely was efiled through CaseFileXpress and also emailed to AUSA Andy Wang on this the 15th day of July 2022 .

/s/ Megan Allburn