

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

CASE NO.: 21-CR-129

Plaintiff,

vs.

Gabriel Garcia,

Defendant.

MOTION FOR PERMISSION TO TRAVEL TO THE DISTRICT OF COLUMBIA

COMES NOW, the Defendant, Gabriel Garcia, and files his motion for permission to travel to the District of Columbia and states the following grounds:

GROUND

1. Mr. Garcia respectfully requests to travel to, and enter into, the District of Columbia on September 24, 2022, so he can confer and meet with his D.C. counsel at counsel's law offices on that Saturday. And, he wants to attend a public event with numerous speakers related to supporting January 6, defendants, which will be held on September 24, 2022, from 1 p.m. to 4 p.m. at the corner of Constitution Ave. NW and First St. NW, north of the reflecting pool.

2. Mr. Garcia would not fly into D.C. or stay the night there. He would commute over on September 24 from Virginia or Maryland. He would not go anywhere else in the District other than counsel's office and the event described above.

3. Mr. Garcia will provide his pretrial officer all of the information regarding his travel and lodging, as he did the previous times when he has traveled with this Court's permission.

4. The Government and Pretrial Services object to this motion, noting that Mr.

Garcia's pretrial conditions of release only allow him to D.C. for court and for pretrial service matters.

MEMORANDUM OF LAW

This Court can grant Mr. Garcia's request under 18 U.S.C. § 3142. While his conditions of release do prohibit him from coming to D.C., there is an exception for court, pretrial business, and meeting with his attorney. Further, Mr. Garcia has no criminal history; the Government has not charged him with committing any violent act on a law enforcement officer; he is not accused of destroying any property. Mr. Garcia only wishes to enter D.C. to meet with his counsel, attend the event, and then leave. He will not go anywhere else, and he will leave the District by 4:30 p.m. In addition, this court allowed him to travel to D.C. to attend a trial this past June, which he did without incident.

WHEREFORE, Mr. Garcia respectfully moves this District Court to allow him to travel to the District of Columbia for the reasons stated above.

Respectfully submitted,

/s/Aubrey Webb
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was efiled to the Office of the Clerk, United States District Court, District of Columbia,

333 Constitution Ave., N.W. Washington D.C. 20001, Room 1225 and to the Office of the United States Attorney, 555 4th St N.W., Washington D.C. 20530, on September 6, 2022.

/s/Aubrey Webb