

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

CASE NO. 21-CR-394 (TNM)

vs.

MATTHEW MARTIN,

Defendant.

**UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE**

Defendant Matthew Martin (Mr. Martin), by and through his undersigned counsel, respectfully moves the Court to modify his conditions of release to permit him to attend the trial in the case of USA v. Griffin, 21-cr-0092 before the Honorable Treavor N. McFadden on March 21, 2022, and to conduct certain pretrial business with his undersigned attorney, to include walking the publicly accessible area around the Capitol for the preparation of the defense of his case, which is scheduled for April 5, 2022 before the Honorable Treavor N. McFadden. As grounds for this motion, Mr. Martin states as follows:

1. Mr. Martin is currently charged by Information with four misdemeanors (two Class A misdemeanors and two Class B misdemeanors), one count each for alleged violation of: 18 U.S.C. §1752(a)(1); 18 U.S.C. §1752(a)(2); 40 U.S.C. §5104 §(2)(D); and 40 U.S.C. §5104 §(2)(G).
2. Mr. Martin is currently under conditions of release that include: “Stay out DC except for Court/Pretrial business and meetings with attorney”.
3. Mr. Martin wishes to be permitted to travel to Washington DC to witness the trial in the case of USA v. Griffin, 21-cr-0092 before the Honorable Treavor N. McFadden on March 21, 2022, and to conduct certain pretrial business with his undersigned attorney, to

include walking the publicly accessible area around the Capitol for the preparation of the defense of his case, which is scheduled for April 5, 2022, before the Honorable Treavor N. McFadden.

4. Mr. Martin contacted his Pretrial Services Officer to obtain permission to travel to Washington DC for the above specified purposes.
5. Mr. Martin's Pretrial Services Officer denied his request to travel to Washington DC for the purposes identified above.
6. The undersigned counsel respectfully submits to the Court that the proposed travel by Mr. Martin to Washington DC is within the spirit of the reasons for which he is permitted to travel to Washington DC and requests that the Court issue an order permitting Mr. Martin to travel to Washington DC for the purposes identified above.
7. The undersigned counsel will be present with Mr. Martin at the trial of USA v. Griffin and during the pretrial business in preparation of his defense with his undersigned attorney, to include walking the publicly accessible area around the Capitol for the preparation of the defense of his case.
8. Both Mr. Martin and the undersigned counsel plan to travel to Washington DC on March 20, 2022 and return to New Mexico on March 22, 2022.
9. AUSA Mary Dohrman has been contacted concerning this motion and she does not oppose it. Ms. Dohrman has requested that Pretrial Services be contacted to provide information about our travel plans/activities and the defense will honor this request.

WHEREFORE, Mr. Martin respectfully moves the Court to modify his conditions of release to permit him to attend the trial in the case of USA v. Griffin, 21-cr-0092 before the this Court on March 21, 2022, and to conduct certain pretrial business with his undersigned

attorney, to include walking the publicly accessible area around the Capitol for the preparation of the defense of his case, which is scheduled for April 5, 2022 before this Court.

Respectfully submitted,

DAN CRON LAW FIRM, P.C.

/s/ Dan Cron

DAN CRON

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Attorneys for Matthew Martin

**Certificate of Service**

I hereby certify that on the 15<sup>th</sup> day of March, 2021 I caused to be served a true copy of the foregoing Unopposed Motion to Modify Conditions of Release to Mary Lyle Dohrmann and Michael Romano, U.S. Attorney's Office for the District of Columbia, via e-filing and email mary.dohrmann@usdoj.gov and Michael.Romano2@usdoj.gov.

/s/ Dan Cron

DAN CRON LAW FIRM, P.C.