

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

UNITED STATES OF AMERICA :
: **1:25-mj-00276 (MAU)**
v. :
: **BRIAN J. COLE, JR.** :
: **Defendant.** :

**DEFENDANT'S MOTION FOR AN ORDER TO ALLOW
IN-PERSON PROFESSIONAL VISITS
AT THE RAPPAHANNOCK REGIONAL JAIL**

COMES NOW Defendant, BRIAN J. COLE, JR., through counsel, and moves this Court for an Order to allow mental health professionals, retained by the defense, to visit Mr. Cole in-person at the Rappahannock Regional Jail (“RRJ”) for purposes of evaluation. The government has represented to undersigned counsel that it takes no position on this Motion.

The RRJ’s internal procedures require a court order to allow professional visits. Absent a court order, the RRJ must engage in its own clearance process. The clearance process is impractical because both mental health professionals that have been engaged for the evaluations will be absent next week and through to the new year. Therefore, Defendant requests an Order to allow the following in-person visits to be conducted this week: (1) Dr. Clifford Sussman on Thursday, December 18, 2025; and (2) Dr. David Black on Friday, December 19, 2025.

WHEREFORE, Defendant prays this Court enter an Order to permit the in-person mental

health evaluations to proceed.

Dated: December 17, 2025

Respectfully submitted,

/s/ John M. Shoreman
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CERTIFICATE OF SERVICE

I, John M. Shoreman, hereby certifies that the following Motion was served on all counsel of record over the Court's ECF filing system this 17th day of December, 2025.

/s/ John M. Shoreman
John M. Shoreman