

UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

Cr. No. 21-377

v.

Hon. Beryl A. Howell

ANTHONY ROBERT WILLIAMS,

Defendant.

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**MOTION FOR PERMISSION TO TRAVEL**

Anthony Williams, through attorney Benton Martin, respectfully moves to travel for 10 days—January 31, 2022, to February 10, 2022—to Jamaica to visit his girlfriend’s family who resides in that country. In support, he states as follows:

1. Mr. Williams is charged with obstruction of an official proceeding, entering and remaining in a restricted building, disorderly conduct in a restrict building and the capitol building, and parading or demonstrating in a capitol building, in connection with the events of January 6, 2021. (R. 13, Ind.)

2. Mr. Williams has been on pretrial release since making his initial appearance in Detroit, Michigan, on March 26, 2021. He is being supervised by Pretrial Officer David Nicoloff in the Eastern District of Michigan. He remains compliant with the conditions of his supervision.

3. For more than a year, Mr. Williams has been in a committed romantic relationship. His girlfriend's family resides in Negril, Jamaica, and Mr. Williams is requesting permission to visit Jamaica to meet her family from January 31, 2022, to February 10, 2022. He would stay in a home owned by his girlfriend's father, and intends to spend time working with a local non-profit, St. Anthony's Kitchen, in Negril, Jamaica.

4. According to Mr. Williams's conditions of pretrial release, the Court must approve any travel outside of the continental United States. (R. 11.)

5. Undersigned counsel spoke with Mr. Williams's supervising Pretrial Services Officer, David Nicoloff, on January 5, 2022, and he has no objection to Mr. Williams traveling to Jamaica given Mr. Williams's compliance with reporting requirements and other conditions of pretrial release. Mr. Williams does not have a history of failing to appear for court hearings and has appeared consistently in this case as directed. He has no prior felony convictions. Respectfully, his demonstrated compliance with conditions in this case is compelling evidence that he will continue to comply with conditions if this request is granted.

6. The Government opposes this request for Mr. Johnson to travel.

Mr. Johnson respectfully asks this Court to grant his Motion for Permission to Travel.

Respectfully,

FEDERAL DEFENDER OFFICE

/s/ Benton C. Martin

Attorney for Defendant  
613 Abbott Street, 5<sup>th</sup> Floor  
Detroit, Michigan 48226  
(313) 967-5542

Dated: January 6, 2022

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**CERTIFICATE OF SERVICE**

I certify that on January 6, 2022, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system, which will send notification to opposing counsel of record.

/s/ Benton Martin  
Federal Defender Office

Dated: January 6, 2022