

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

United States of America,

Plaintiff,

Criminal No. 23-30035

v.

Originating No. 1:23-mj-24

Isaac Thomas,

Defendant.

**GOVERNMENT’S PETITION FOR TRANSFER OF
DEFENDANT TO ANOTHER DISTRICT AND SUPPORTING BRIEF**

Pursuant to Rule 5(c)(3)(D) of the Federal Rules of Criminal Procedure, the United States of America hereby petitions the Court for an order transferring defendant Isaac Thomas to answer to charges pending in another federal district, and states:

1. On January 26, 2023, defendant made an initial appearance in the Eastern District of Michigan in connection with a federal arrest warrant issued in the District of Columbia. Defendant is charged in that district with the following violations:
 - 18 U.S.C. § 1752(a)(1)- Entering or remaining in a restricted building or grounds;

- 18 U.S.C. § 1752(a)(2)- Disorderly or disruptive conduct in a restricted building or grounds,
- 18 U.S.C. § 1752(a)(4)- Engaging in physical violence in a restricted building or grounds,
- 18 U.S.C. § 1752(b)(1)(A)- Entering and remaining in a restricted building or grounds with a deadly or dangerous weapon,
- 40 U.S.C § 5104(e)(2)(D)- Disorderly conduct in a capitol building,
- 40 U.S.C § 5104(e)(2)(F)- Act of physical violence in the capitol grounds or buildings,
- 40 U.S.C § 5104(e)(2)(G)- Parade, demonstrate, or picket in any of the capitol buildings,
- 18 U.S.C. § 111(a)(1)&(b)- Assaulting, resisting, or impeding certain officers using a dangerous weapon,
- 18 U.S.C. § 1512(c)(2)- Obstruction of an official proceeding, and
- 18 U.S.C. § 231(a)(3)- Civil disorder.

2. Rule 5 requires this Court to determine whether defendant is the person named in the arrest warrant and is entitled to a preliminary examination as for the charges described in Paragraph One above. *See* Fed. R. Crim. P. 5(c)(3)(D)(ii).

WHEREFORE, the government requests this Court to conduct transfer proceedings in accordance with Rule 5 of the Federal Rules of Criminal Procedure.

Respectfully submitted,

DAWN N. ISON
United States Attorney

s/JULES M. DePORRE
Jules M. DePorre
Assistant United States Attorney
600 Church Street, Suite 200
Flint, MI 48502
Jules.DePorre@usdoj.gov
(810) 766-5177

Dated: January 26, 2023