

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

UNITED STATES OF AMERICA :
 :
 Plaintiff, :
 :
 v. :
 :
 EDUARDO ALVEAR GONZALEZ, :
 :
 Defendant. :
 _____ :

Case Number: 21-cr-0115 CRC

**MOTION FOR RECONSIDERATION OF REQUEST FOR TRAVEL, AND
CORRECTION OF RECORD DUE TO COUNSEL’S FAILURE TO FULLY AND
ADEQUATELY EXPLAIN CIRCUMSTANNCE FOR REQUESTED TRAVEL**

Anthony D. Martin, court appointed counsel, files the following correction or record, regarding defendant’s Motion for Travel during the period December 18th, 2021 to January 2nd, 2022.

Procedural Posture

Mr. Gonzalez sentencing is scheduled for January 5th, 2022 at 10:00 am.

Basis for Request

The predominate reason for the requested travel was to work. Defendant is a production manager and producer of podcasts. He has an opportunity to have his expenses paid while working in the United Kingdom. Counsel’s failure to fully explain the reasons for the requested authorization to travel, made it appear that he does not take his current circumstance seriously. He further represents that he has been able to travel to other states for work related reasons.

•
Prayer

WHEREFORE, the Defendant respectfully requests that the court reconsider his earlier request and that he be permitted to travel to England on December 18th, 2021 and return to the United States on January 2nd, 2022.

Respectfully submitted,
ANTHONY D. MARTIN

By: _____/S/
Anthony D. Martin, 362-537
GREENWAY CENTER OFFICE PARK
7474 Greenway Center Drive, Ste 150
Greenbelt, MD 20770
(301) 220-3700; (301) 220-1625(fax)

Attorney for Eduardo Gonzalez

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing MOTION FOR RECONSIDERATION TO PERMIT OCONUS TRAVEL, was sent electronically on the date appearing below to:

Troy A. Edwards, AUSA
United States Attorney's Office
555 4th Street, NW
Washington, DC 20001

On this Thursday, November 18, 2021

By: /s/ Anthony D. Martin

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ORDER

(Permission to Travel Outside the United States)

This matter is before the court on a motion filed by EDUARDO GONZALEZ, through his court-appointed counsel. Mr. Gonzalez seeks permission to travel to England, during the period December 18th, 2021 to January 2nd, 2022. The government opposes the request and the United States Pre-trial Services Office has not responded to counsel’s query on whether they have any objections.

After having reviewed the record as a whole and noting the government’s objection, IT APPEARS TO THE COURT, that no good reasons has been presented by the government to deny the request.

WHEREFORE, IT IS ORDERED this _____ day of November, 2021 that the request be and is HEREBY GRANTED. IT IS further ORDERED that Mr. Gonzalez is permitted to travel to England no sooner than December 18th, 2021 and return to the United States no later than January 2nd, 2022.

JUDGE

cc:

Troy A. Edwards, AUSA
United States Attorney's Office
555 4th Street, NW
Washington, DC 20001

Anthony D. Martin, 362-537
GREENWAY CENTER OFFICE PARK
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