

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

CASE NO.: 21-CR-129

Plaintiff,

vs.

Gabriel Garcia,

Defendant.

MOTION FOR PERMISSION TO TRAVEL OUT OF THE STATE

COMES NOW, the Defendant, Gabriel Garcia, and files his Motion for Permission to Travel Out of the State, and states the following grounds:

FACTUAL GROUNDS

1. Mr. Garcia respectfully requests to travel for the holidays to New Orleans with his minor children and girlfriend to visit his family from December 21, 2021 to December 25, 2021, via a round-trip flight out of Miami.
2. Mr. Garcia will provide his Pretrial Officer all of the information regarding his travel and lodging, as he did the previous times when he has traveled with this Court's permission.
3. Counsel contacted AUSA A. Buckner for the Government's position. She stated the Government does not object.

MEMORANDUM OF LAW

This Court can grant Mr. Garcia's request under 18 U.S.C. § 3142. Specifically, Mr. Garcia requests permission to fly from Miami to New Orleans on December 21, 2021, to visit family for the holidays. His lodging will also be in New Orleans. He will return to Miami by flight on December 25, 2021.

WHEREFORE, Mr. Garcia respectfully moves this District Court to allow him to travel to New Orleans, as detailed above.

Respectfully submitted,

/s/Aubrey Webb
Law Offices of Aubrey Webb
55 Merrick Way, Suite 212
Coral Gables, Florida 33134
305-461-1116
Email: aubrey@aqwattorney.com

/s/Charles R. Haskell
Law Offices of Charles R. Haskell
641 Indiana Ave. N.W.,
Washington D.C. 20004
202-888-2728
Email: Charles@CharlesHaskell.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was efiled to the Office of the Clerk, United States District Court, District of Columbia, 333 Constitution Ave., N.W. Washington D.C. 20001, Room 1225 and to the Office of the United States Attorney, 555 4th St N.W., Washington D.C. 20530, on December 13, 2021.

/s/Aubrey Webb