

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

CASE NO.: 21-CR-129

Plaintiff,

vs.

Gabriel Garcia,

Defendant.

UNOPPOSED 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 Phoenix, Arizona with his girlfriend to visit her family from January 5, 2023, to January 9, 2023, via a round-trip flight out of Ft. Lauderdale.

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. Loeb and Pretrial Services for their positions on this request. The Government and his Pretrial Service Officer do 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 Ft. Lauderdale to Phoenix on January 5, 2023, with his girlfriend to visit her family for the holiday season. His lodging will also be in Phoenix. He will return on a flight on January 9, 2023.

WHEREFORE, Mr. Garcia respectfully moves this District Court to allow him to travel to Phoenix, 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

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 28, 2022.

/s/Aubrey Webb