UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

United States of America, Plaintiffs, v. Kevin Louis Galetto,

Case No.: 1:21-mj-00385-ZMF

Defendant.

MOTION FOR PERMISSION TO TRAVEL AND TRANSFER SUPERVISION

Defendant, Kevin Louis Galetto, respectfully moves this Court for permission to travel by RV, primarily via Interstate 10, from the Central District of California to his sister's and brotherin-law's home at 2585 South Cortenay Pkwy., Merritt Island, FL 32952, departing from the Central District of California on or about June 8, 2021, and arriving at his sister's home on or about June 19, 2021. Mr. Galetto sold his home in California and is relocating to Florida with his wife to live and work.

Richard Portale, counsel for Mr. Galetto, spoke to Assistant United States Attorney Jennifer M. Rozzoni and Pretrial Services Officer Vanessa Singh, and provided them with a copy of this motion, and they both stated that they do not oppose Mr. Galetto's request to relocate. On or about June 1, 2021, Mr. Galetto's California supervision was transferred from P.O. Vanessa Singh to P.O. Jesse Rodriguez. Mr. Portale spoke to P.O. Rodriguez via telephone on June 4, 2021 and then forwarded a copy of this motion to P.O. Rodriguez so that he would be familiar with its contents. P.O. Rodriguez also does not oppose the instant motion.

Below is a summary of Galetto's proposed travel itinerary and resting locations between the Central District of California and his sister's home:

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- June 8, 2021 to June 9, 2021: Picacho Peak RV Resort, 17065 E. Peak Lane, Picacho, AZ 85141, Phone: (520) 466-7841, Email: reservations@picachopeakrv.com
- June 9, 2021 to June 10, 2021: El Paso Roadrunner RV Park, 1212 Lafayette Drive, El Paso, TX 79907, Phone: (915) 598-4469, Email: elpasoroadrunnerrv@gmail.com
- June 10, 2021 to June 11, 2021: Kerrville KOA Journey, 2400 Goat Creek Road, Kerrville, TX 78028, Phone: (830) 895-1665
- June 11, 2021 to June 13, 2021: Lafayette KOA Holiday, 1825 Saint Mary St., Scott, LA 70583, Phone: (830) 625-5004
- June 13, 2021 to June 18, 2021: Twin Lakes Camp Resort, 580 Holley King Road, DeFuniak Springs, FL 32433, Phone: (850) 892-5914
- June 18, 2021 to June 19, 2021: Water's Edge RV Resort, 701 W. Highway 318, Citra, FL 32113, Phone (352) 595-4590
- June 19, 2021: Arrival at Sister and Brother-in-Law's House, 2585 South Cortenay Pkwy., Merritt Island, FL 32952, (714) 654-9341, Email: kmcguigan84@gmail.com

These specific dates are subject to reasonable change due to travel conditions, such as traffic and weather; however, the planned route, individual stops, and final destination will remain in place. Galetto's next appearance before this Court is not until June 29, 2021, so he will have completed his trip well before that date.

Prior to his departure from the Central District of California, Mr. Galetto's location monitoring will be disabled. Thereafter, Mr. Galetto will call in to his assigned pretrial services officer as directed every two days to verify his location and progress towards his destination. Upon arrival at his sister's home at 2585 South Cortenay Pkwy., Merritt Island, FL 12952, Galetto's supervision will be transferred to the United States Probation Office for the Middle

Case 1:21-mj-00385-ZMF Document 13 Filed 06/08/21 Page 3 of 3

District of Florida, Orlando Division, which has jurisdiction over Brevard County, Florida, and his location monitoring will be reactivated.

On April 30, 2021, Galetto appeared before the Honorable G. Michael Harvey for an initial appearance. Judge Harvey released Galetto on his own recognizance subject to the following relevant conditions: (1) submit to supervision by and report for supervision to the Central District of California no later than 5/4/2021; (2) surrender any passport to the U.S. Probation Office for the Central District of California; (3) not obtain a passport or other international travel document; (4) stay out of the District of Columbia except for court, pretrial business, and/or meetings with his attorney; (5) submit to and comply with GPS location monitoring as directed by pretrial services; and (6) notify the U.S. Probation Office for the Central District of travel outside the Central District of California. The Court did not impose any curfew, home detention, or home incarceration restrictions. Therefore, none of the bail conditions imposed prohibit Galetto from traveling and relocating as requested.

Conclusion

WHEREFORE, the Defendant prays for permission to travel as described above.

Dated: June 8, 2021

Respectfully submitted,

<u>/s/ Nina J. Ginsberg</u> Nina J. Ginsberg, Esquire DC Bar No. 251496 *DiMuroGinsberg, PC* 1101 King Street, Suite 610 Alexandria, VA 22314 Telephone: (703) 684-4333 Facsimile: (703) 548-3181 Email Address: nginsberg@dimuro.com

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

United States of America,

Plaintiffs,

v.

Kevin Louis Galetto,

Case No.: 1:21-mj-00385-ZMF

Defendant.

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Proposed Order Permitting Travel and Transfer of Supervision

The Defendant, Kevin Louis Galetto, has moved this Court for permission to travel from the Central District of California to his sister's and brother-in-law's home at 2585 South Cortenay Pkwy., Merritt Island, FL 32952; and it

APPEARING THAT Mr. Galetto has sold his home in California and is relocating to Florida with his wife to live and work; and it

FURTHER APPEARING THAT Assistant United States Attorney, Jennifer M. Rozzoni, and Pretrial Services Officer, Vanessa Singh, have been provided with a copy of the Defendant's motion and proposed travel plan, and do not oppose his request to relocate; it is hereby

ORDERED that the Defendant is granted permission to travel from California to Merritt Island, Florida and to relocate to his sister's and brother-in-law's home at 2585 South Cortenay Pkwy., Merritt Island, FL 32952, and that subject to reasonable changes due to travel conditions, he abide by the following travel itinerary:

- June 8, 2021 to June 9, 2021: Picacho Peak RV Resort, 17065 E. Peak Lane, Picacho, AZ 85141, Phone: (520) 466-7841, Email: reservations@picachopeakrv.com
- June 9, 2021 to June 10, 2021: El Paso Roadrunner RV Park, 1212 Lafayette Drive, El Paso, TX 79907, Phone: (915) 598-4469, Email: elpasoroadrunnerrv@gmail.com

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- June 19, 2021: Arrival at Sister and Brother-in-Law's House, 2585 South Cortenay Pkwy., Merritt Island, FL 32952, (714) 654-9341, Email: <u>kmcguigan84@gmail.com</u>; and it is

FURTHER ORDERED that prior to his departure from the Central District of California, the Defendant's location monitoring will be disabled, and thereafter, the Defendant will call his assigned pretrial services officer as directed every two days to verify his location and progress towards his destination; and it is

FURTHER ORDERED that upon arrival at his sister's home at 2585 South Cortenay Pkwy., Merritt Island, FL 12952, the Defendant's supervision will be transferred to the United States Probation Office for the Middle District of Florida, Orlando Division, which has jurisdiction over Brevard County, Florida, and his location monitoring will be reactivated.

All remaining conditions of supervision will remain the same.

Date entered:

JUDGE