UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	)	
v.	)	**CR. NO. 21-205 (DLF)**
PATRICIA TODISCO	)	

MOTION FOR TRAVEL

Patricia Todisco, through undersigned counsel, respectfully moves this Honorable Court to permit her travel to from Florida to New Jersey and states as follows:

1) Ms. Todisco was sentenced to 36 months' probation on July 12, 2022. She resides and works in Florida and her probation has been transferred to the Southern District of Florida.
2) Ms. Todisco wishes to visit her family for her nephew's birthday from August 10th to August 17th. Her family lives in New Jersey. Ms. Todisco is originally from New Jersey. Ms. Todisco diligently made this request to undersigned counsel last week. Ms. Todisco was informed by her probation officer that if the Court approves her travel, she would be allowed to travel to New Jersey.
3) Undersigned counsel reached out to government counsel immediately prior to filing this motion and has not received a response. Undersigned counsel will supplement the motion with the government's response.

Respectfully Submitted,

A.J. KRAMER
FEDERAL PUBLIC DEFENDER

____/s/_____
Ubong E. Akpan

Assistant Federal Public Defender
625 Indiana Ave., N.W.
Washington, D.C. 20004
(202) 208-7500

CERTIFICATE OF SERVICE

I, Ubong E. Akpan, certify that on this 5th day of August 2022, I caused a copy of the foregoing Motion to be filed through the Electronic Case Filing ("ECF") system and served a copy on counsel for the government via email.

/s/
Ubong E. Akpan
Assistant Federal Public Defender