

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	)	
	)	
v.	)	No. 21-cr-580 (DLF)
Robert Ballesteros	)	
	)	
Defendant.	)	
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**UNOPPOSED MOTION TO TO ALLOW TRAVEL WHILE ON SUPERVISION**

COMES NOW, the defendant, Robert Ballesteros, by and through his counsel, and herein respectfully moves the Court to permit him to travel on a cruise with his family leaving from Florida on August 13, 2022 and returning on August 21, 2022. Counsel submits the following in support of this motion.

1. On April 28, 2022, Mr. Ballesteros was sentenced on a violation of 40 U.S.C. §5104(e)(2)(G) to thirty-six months of probation, which he is currently serving.
2. Special conditions of his probation include: (1) substance abuse testing, (2) mental health treatment, and (3) a requirement that he complete 40 hours community service within 30 months.
3. To undersigned counsel’s knowledge, there has been no violations of his probation thus far.
4. If permitted to travel, he would join his father, his step-mother, and his step-brother, who plan to fly to Florida on August 11, 2022, and stay in a hotel until the cruise leaves on August 13, 2022. The cruise is scheduled to leave from Fort Lauderdale on August 13, 2022, where it will then travel to San Juan, Puerto Rico, St. Thomas, St. Marten, and then lastly the Nassau, Bahamas. The cruise ship will stop at each location for the day where

passengers will be permitted to leave the ship and will have to return to the ship at the scheduled time.

5. Undersigned counsel has conferred with his probation officer in the Southern District of New York, who has advised that he does not oppose this request if Mr. Ballesteros continues to have negative drug tests, no re-arrests, provides him with some requested information, and completes an intake assessment for his substance abuse treatment.
6. Mr. Ballesteros also plans to make a payment toward his restitution obligation in the next week as well start his community service.
7. Undersigned counsel has also conferred with government counsel, who has no objection to this request.
8. Mr. Ballesteros has been compliant with his supervision and does not pose a risk of flight. Furthermore, he will keep his probation officer notified of his plans and will provide him of any information that is requested.
9. Another court in this jurisdiction has granted a similar request in *U.S. v. Timothy Hart*, 21-cr-540 (PLF), where the court found it was appropriate to allow a defendant on pre-trial supervision to travel on a similar cruise. *See* ECF No. 26.

WHEREFORE, Mr. Ballesteros respectfully requests that the Court permit him to travel outside of the continental United States only for the purpose of traveling on this cruise leaving on August 13, 2022, and returning on August 21, 2022.

Respectfully submitted,

A.J. KRAMER  
FEDERAL PUBLIC DEFENDER

/s/

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