

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

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v.

*

CR No. 21-mj-384-ZMF

WILLARD JAKE PEART

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Defendant

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* * * * *

**DEFENDANT WILLARD JAKE PEART'S MOTION FOR PERMISSION TO TRAVEL
TO CANCUN, MEXICO**

COMES NOW, the Defendant by counsel the Law Office of John S. Tatum, P. C. and requests permission to travel to Mexico for a combined business/pleasure trip between September 7 and September 15, 2021. In support of this Motion, Mr. Peart informs the Court as follows:

1. Mr. Peart is a Realtor with ERA Brokers Consolidated in the St. George, Utah area and has been so employed for approximately nine years. Periodically, he takes business/pleasure trips with colleagues and business associates as part of his business/networking practices.
2. This year, Mr. Peart, his wife, and several business associates and their spouses are traveling to Cancun, Mexico from September 7 through September 15, 2021. Mr. Peart requests permission to travel to Mexico for this event as he has done various times in the past.
3. If the Court approves this request, Mr. Peart will travel with his wife Rachel Peart and several business associates and their spouses. They will depart Salt Lake City, Utah on Delta Airlines Flight 649 at 9:45 a.m., Tuesday,

September 7, 2021. They will return to Salt Lake City, Utah, on September 15, 2021, departing Cancun, Mexico on Delta Flight 647 at 4:42 p.m. While in Cancun, Mr. Peart will stay at the Fairmont Mayakoba, Cancun KM 298, Playa Del Carmen, Mexico 77710.

4. Mr. Peart is not a flight risk or a danger to the community:
 - a. Mr. Peart has been at liberty on bond since his voluntary surrender to authorities on or about April 22, 2021. Prior to that time, Mr. Peart contacted undersigned Defense Counsel and authorized the undersigned to contact the FBI and arrange to turn himself in. This was accomplished on or about January 20, 2021 at which date Mr. Peart presented himself to the St. George, Utah FBI Field Office and gave a video-recorded statement regarding his involvement in the events of January 6, 2021 at the United States Capitol. Mr. Peart has further cooperated by providing access to his cell phone and providing a photograph of himself in the clothes he was wearing on January 6, 2021. Mr. Peart has at all times evidenced a desire to resolve this case in an accountable fashion and has taken no actions to the contrary.
 - b. Mr. Peart has been married to his wife Rachel for 22 years. They have five children two of whom are currently serving missions for the Church of Jesus Christ of Latter Day Saints and the others reside at home. See, photo of Mr. Peart and family in the photo inserted below:



- c. Mr. Peart has other family members including his Father, Mother and siblings who reside either in Utah or Idaho. Mr. Peart is active in his Church and other community activities. He has close ties to the Hurricane and St. George, Utah areas and has had such for much of his life.
5. The undersigned has contacted Assistant United States Attorney Brittany Reed via e-mail regarding this request and we are authorized to state that the Government has no objection to this travel request.
6. Mr. Peart will contact his supervising Pre-Trial Officer prior to his departure and within 48 hours of his return from Cancun.
7. Given that the Government does not oppose this Motion and travel arrangements must be finalized shortly, we request that the Court rule thereon at its earliest opportunity without a Hearing.

WHEREFORE, Mr. Peart respectfully requests that the Court authorized him to travel to Cancun, Mexico on the dates set forth herein and for such other and further relief as the Court deems fit in the premises.

Respectfully submitted this 26th day of July, 2021.

JOHN S. TATUM, P.C.

/s/ John S. Tatum

John S. Tatum

12361 East Cornell Avenue

Aurora, Colorado 80014

Cell: 303-810-3952¹

Telephone: (303) 750-6888

Facsimile: (303) 750-8279

Email: john@johntatumlaw.com

¹ Please utilize this Cell Number during COVID-19 Pandemic as our office is generally closed.

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of July, 2021 a true and correct copy of the foregoing DEFENDANT WILLARD JAKE PEART'S MOTION FOR PERMISSION TO TRAVEL TO CANCUN, MEXICO_was filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to parties of record, including the following:

Brittany L. Reed, Esq.
Assistant United States Attorney
Brittany.Reed2@usdoj.gov

/s/ John Tatum _____

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**ORDER GRANTING: DEFENDANT WILLARD JAKE PEART’S MOTION FOR
PERMISSION TO TRAVEL TO CANCUN, MEXICO**

THIS MATTER, is before the Court on Defendant Peart’s Motion For Permission To Travel to Cancun, Mexico for a combined business/pleasure trip between September 7 and September 15, 2021. THE COURT has considered the Motion and the Court’s file, noted that the Government has no objection and being fully advised in the premises, hereby ORDERS as follows:

1. Mr. Peart’s Motion For Permission To Travel To Cancun, Mexico is GRANTED.
2. Mr. Peart may travel with his wife Rachel Peart to Cancun, Mexico departing Tuesday, September 7, 2021 and returning to the State of Utah on September 15, 2021.
3. Mr. Peart shall contact his supervising Pre-Trial Officer prior to his departure and within 48 hours of his return from Cancun, Mexico.
4. IT IS FURTHER ORDERED: _____
_____.

DONE this _____ day of _____, 2021.

BY THE COURT:

United States Magistrate Judge