

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

Criminal Action No. 21-46 (RDM)

BRADY KNOWLTON,

Defendant.

DEFENDANT'S UNOPPOSED MOTION TO TRAVEL

TO THE HONORABLE RANDOLPH D. MOSS, UNITED STATES DISTRICT
JUDGE FOR THE DISTRICT OF COLUMBIA:

BRADY KNOWLTON, the Defendant in the above-styled and numbered cause, by and through undersigned counsel, requests this Court permit him to travel to Mexico for business purposes, as well as to allow him to take his daughter there for medical treatment. In support thereof, he would show the following.

1. On April 7, 2021, Mr. Knowlton was released on conditions of release that require *inter alia* he abide by certain travel restrictions, namely, that he not travel outside the state of Utah without permission from the pretrial officer and not travel outside the United States without prior permission from the Court. ECF Dkt. 16, Condition 6(b)(ii) & (iii)).
2. As referenced in previous motions, Mr. Knowlton owns multiple businesses in Mexico that require his attention. *See, e.g.*, ECF Dkt. 55, 92.

3. Not previously mentioned is the fact that Mr. Knowlton has an 11-year-old daughter who is autistic with severe defiant aggression. To treat this, Mr. Knowlton had previously taken her to a medical clinic in Cancun to receive stem cell treatment. While the treatment improved her symptoms, doctors want her to return for subsequent treatment.
4. Accordingly, Mr. Knowlton is seeking permission to travel to Mexico from July 17 to July 28, 2022 both to take his daughter to this needed medical treatment and also to attend to one of his businesses there. More specifically, Mr. Knowlton wishes to travel by air to Cancun, Mexico where he will then travel within the state of Quintana Roo to the location of his business, as well as the clinic where his daughter will be receiving the required stem cell treatment. Exact travel details and locations where he will be staying will be provided to his supervision officer.
5. Because Mr. Knowlton had to surrender his passport as a condition of his release, this travel will require the temporary release of his passport for this limited travel. Accordingly, he is seeking permission to have his supervision officer with Pretrial Services release his passport to him by on the condition that he return the passport to his supervision officer with Pretrial Services within 72 hours of his arrival back in the United States.
6. Undersigned counsel conferred with counsel for the Government, Elizabeth Kelley, and confirmed that she does not object to this motion. The Defendant conferred with his pretrial supervision officer, Devin Dalton, and he likewise has no

objection to this motion.

WHEREFORE, PREMISES CONSIDERED, Mr. Knowlton respectfully requests this Court permit him to travel to Mexico as requested and further requests permission to have his passport temporarily released to him for the limited purpose of this travel.

Date: June 3, 2022

Respectfully Submitted,

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ATTORNEYS FOR THE DEFENDANT,
BRADY KNOWLTON

CERTIFICATE OF CONFERENCE

I certify that I conferred with both Elizabeth Kelley, attorney for the Government, and she does not object to this motion.

/s/ T. Brent Mayr
Brent Mayr
Attorney for Brady Knowlton

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this motion was sent to Counsel for the Government on June 3, 2022, via CM/ECF and by email to Devin Dalton, Pretrial Services Officer for the District of Utah assigned to supervise Mr. Knowlton on the same date.

/s/ T. Brent Mayr
Brent Mayr
Attorney for Brady Knowlton