

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

BRADY KNOWLTON,

Defendant.

Criminal Action No. 21-46 (RDM)

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. 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](#), [121](#).
3. Mr. Knowlton is seeking permission to travel to Puerto Aventuras, Mexico from March 11 to 23, 2023 to work at one of his businesses. Exact travel details and

locations where he will be staying will be provided to his supervision officer.

4. 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, as he has done so in the past, he is seeking permission to have his supervision officer with Pretrial Services release his passport to him immediately prior to his travel 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.
5. Undersigned counsel conferred with counsel for the Government, James Peterson, and confirmed that he does not object to this motion. Counsel further 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: February 23, 2023

Respectfully Submitted,

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ATTORNEYS FOR THE DEFENDANT,
BRADY KNOWLTON

CERTIFICATE OF CONFERENCE

I certify that I conferred with both James Peterson, attorney for the Government, and Devin Dalton, Probation Officer for the District of Ohio, and neither 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 February 23, 2023, via CM/ECF and by email to Devin Dalton, Pre-trial 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