

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

Criminal Action No. 21-46-2 (RDM)

BRADY KNOWLTON,

Defendant.

DEFENDANT'S 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 the Republic of Kiribati in the South Pacific 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. In addition to the multiple businesses that Mr. Knowlton owns, he also is employed intermittently as a fishing and hunting guide. A group of travelers have approached him and expressed an interest in hiring him to lead a fishing trip to

the Phoenix Islands in the Republic of Kiribati. He would be flying from the United States to the American Samoan islands and then traveling by boat to that location.

3. Counsel for Mr. Knowlton conferred with his supervision officer with Pretrial Services in Utah, Devin Dalton, and confirmed Mr. Knowlton “has been compliant with his conditions of release and other work-related trips outside of the US” and is not opposed to this trip.
4. Counsel likewise conferred with counsel for the Government, James Peterson, regarding this motion. The Government takes no position on this motion and defers to the Court.
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, 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.

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

Date: March 14, 2023

Respectfully Submitted,

RONALD SULLIVAN LAW, PLLC

by: /s/ Ronald S. Sullivan Jr.

RONALD S. SULLIVAN JR.

D.C.D.C. Bar ID 451518
rsullivan@ronaldsullivanlaw.com

1300 I Street NW
Suite 400 E
Washington, DC 20005
Telephone: (202) 935-4347
Fax: (617) 496-2277

MAYR LAW, P.C.

by: /s/ T. Brent Mayr
T. BRENT MAYR
Texas State Bar Number 24037052
D.C.D.C. Bar ID TX0206
bmayr@mayr-law.com

5300 Memorial Dr., Suite 750
Houston, TX 77007
Telephone: 713-808-9613
Fax: 713-808-9613

WAGNER PLLC

by: /s/ Camille Wagner
CAMILLE WAGNER
DC Bar No. 1695930
law@myattorneywagner.com

1629 K Street NW, Suite 300
Washington, DC 20006
(202) 630-8812

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 Utah, and their positions are stated herein.

/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 March 14, 2023, 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