

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

KENNETH THOMAS,

Defendant.

Case No.: 1:21-cr-00552 DLF-1

**EMERGENCY MOTION TO PERMIT
TRAVEL FOR WORK PURPOSES**

COMES NOW, Kenneth Thomas, through undersigned counsel, to request leave of this honorable court to permit temporary relocation to the Southern District of Ohio for three weeks for work purposes and prospectively for other work related purposes. As grounds for this motion counsel would state:

1. The defendant is charged with Civil Disorder, Obstruction of Official Proceedings, Assaulting, Resisting, or Impeding Certain Officers, Entering and Remaining in a Restricted Building or Grounds, Disorderly and Disruptive Conduct in a Restricted Building or Grounds, Engaging in Physical Violence in a Restricted Building or Grounds, Disorderly Conduct in a Capitol Building, and Act of Physical Violence in the Capitol Grounds or Buildings, in violation of 18 U.S.C. §§231(a)(3), 1512(c)(2), 111(a)(1), 1752(a)(2), and 1752(a)(4), and 40 U.S.C. §§5104€(2)(D) and €(2)(F).

2. The defendant is on Personal Recognizance with the requirement that the defendant must advise the court or the pretrial services office or supervising officer in writing before making any change of residence or telephone

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number.” and “. . . notify the Northern District of Ohio (Youngstown) in advance of any and all travel outside the Northern District of Ohio.”

3. The defendant is currently employed by the Davey Resource Group and has been promoted to site manager.

4. The defendant will be required to work in the Southern District of Ohio for three weeks beginning September 27, 2021 and may be required to travel to other locations as part of his promotion.

5. The Pretrial Services Officer in the Northern District of Ohio requires court approval to permit the temporary relocation.

6. The Pretrial Services Officer in the Northern District of Ohio does not oppose this motion.

7. The United States does not oppose this motion if the Pretrial Services Office does not oppose it.

WHEREFORE, counsel respectfully requests that the court grant the defendant leave to travel for work purposes.

Dated: September 24, 2021

Respectfully submit

Joseph R. Conte, Bar #366827
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