

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

**UNITED STATES OF AMERICA**

**v.**

**Case No. 1:21-cr-00331**

**KENNETH KELLY,**

**Defendant.**

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**UNOPPOSED MOTION TO AMEND TERMS OF PRETRIAL RELEASE**

**COMES NOW**, the Defendant, **KENNETH KELLY**, by and through his undersigned attorney and moves this Honorable Court to issue an Order amending the terms of the pretrial release and would state:

1. The pretrial release Order in this matter limits travel to the continental United States, which excludes Hawaii and Alaska.
2. The Defendant is currently involved in a divorce, and his wife has moved to Hawaii with her family, along with the defendant's children. The Defendant wishes to visit his children and have contact with them; however, the current pretrial Order would preclude that.
3. The Defendant has consulted with the U.S. Attorney's Office, and they have no objection to amending the pretrial release Order to allow the defendant to travel to Hawaii.

4. The U.S. Attorney's Office has contacted pretrial services, and they have deferred to the Court.

**WHEREFORE**, the Defendant, **KENNETH KELLY**, moves this Honorable Court without opposition from the government to issue an Order amending the pretrial release Order to allow for travel to Hawaii, under the same conditions as all other travel.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that true and correct copy of the foregoing document was filed through the CM/ECF electronic filing system, and forwarded to counsel for the plaintiff at the following email address: [hava.mirell@usdoj.gov](mailto:hava.mirell@usdoj.gov) on this 18<sup>th</sup> day of November 2021.

**TRAGOS, SARTES & TRAGOS, PLLC**

*/s/ George E. Tragos, Esq.*

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