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Attorney for Defendant
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

PLAINTIFF

v.

JANET BUHLER,

DEFENDANT

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CRIMINAL NO. 1:21-CR 510-(CKK)

MOTION FOR PERMISSION TO TRAVEL

MOTION FOR PERMISSION TO TRAVEL OUT OF STATE

COMES NOW, Janet Buhler by and through her counsel, Brett L. Tolman, and moves the court for an Order allowing Buhler to travel from her residence in Kaysville, UT to Cabo, Mexico March 5-8, 2022, with her husband to attend a business-related conference.

SUGGESTIONS IN SUPPORT

1. Buhler’s current Order Setting Conditions of Release restricts her travel to the District of Utah.
2. Buhler will need access to her passport to make this travel possible. The defendants’ passport is currently held by the government.
3. Buhler is in full compliance with her Pre-trial release conditions. Buhler is not considered a threat to the public or a flight risk.

4. Buhler has recently lost a significant portion of her income due to being fired from her teaching job at Salt Lake Community College. Participating in this conference would help her build her clothing business to help her recover some of those losses and allow her to continue to support her son who is currently in rehab.
5. Assistant United States Attorney Hava Mirell does not oppose this motion.
6. Buhler's Pre-Trial Services Officer, Tasia Benzmilller, has no objections to the travel.

Respectfully submitted,

Brett L. Tolman

By: _____/s/
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CERTIFICATE OF SERVICE

I hereby certify on the 25th day of February 2022, a copy of same was electronically filed using the CM/ECF system and thus delivered to the parties of record and in pursuant to the rules of the Clerk of Court.

Sarah Fiedler

_____/s/
Sarah Fiedler