

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

UNITED STATES OF AMERICA

v.

Case No. 1:21-cr-00331

KENNETH KELLY,

Defendant.

_____ /

UNOPPOSED MOTION TO TRAVEL

COMES NOW, the Defendant, KENNETH KELLY, by and through his undersigned attorney, and moves this Honorable Court to issue an order allowing the Defendant to travel to Hawaii to visit his children and wife.

1. The Defendant is currently in the process of getting a divorce. His wife and children have moved to Hawaii to be near the wife's family.
2. The Court has allowed travel for the Defendant in the continental United States which does not include Hawaii. Therefore, the Defendant is asking the Court for specific permission to travel to Hawaii between the dates of December 23, 2021 to December 31, 2021. (Please see the emails confirming the travel arrangements attached hereto as Exhibit A.)
3. Assistant United States Attorney Hava Mirell has been contacted and has no objection to the travel.

WHEREFORE, the Defendant, **KENNETH KELLY**, moves this Honorable Court for an order allowing the Defendant to travel to Hawaii from December 23, 2021 through December 31, 2021 for the purpose of visiting his wife and children.

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 on this 6th day of December 2021.

TRAGOS, SARTES & TRAGOS, PLLC

/s/ George E. Tragos, Esq. _____

GEORGE E. TRAGOS, ESQ.

Florida Bar No. 184830

E-mail: george@greeklaw.com

PETER A. SARTES, MBA/JD

Florida Bar No. 582905

E-mail: peter@greeklaw.com

2363 Gulf to Bay Blvd, Ste 100

Clearwater, FL 33765

PH: (727) 441-9030

linda@greeklaw.com

paralegal@greeklaw.com