

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA
CRIM. NO. 21-00189 (CJN)

UNITED STATES OF AMERICA,
Plaintiff,

v.

RICHARD L. HARRIS,
Defendant.

UNOPPOSED MOTION FOR PERMISSION TO TRAVEL

The Defendant, Richard Harris, through undersigned counsel, moves this Court for permission to travel to Near Bend, Oregon, between September 25, 2022, and September 27, 2022, inclusive, and states that:

On May 19, 2021, this Court ordered that Mr. Harris be released from pretrial detention pending resolution of the instant charges. One of the conditions of release subjects him to “Stand Alone Monitoring” that requires that he wear a GPS monitor and sleep nightly at his father’s residence. (DE 33, 34). He has for the past fifteen months been compliant with that – and every other – condition imposed by the Court.

As noted in an earlier pleading, (DE 33), Mr. Harris recently became engaged to be married. He would like to travel with his fiancée to Near Bend, Oregon¹ for a brief getaway. They intend to leave early morning on September 25, 2022, and return on the evening of September 27, 2022.

¹ Near Bend is approximately 112 miles from Mr. Harris’s father’s home.

Neither Assistant United States Attorney Jason Manning nor United States Probation Officer Nicholas Nishik oppose this request.

WHEREFORE, the Defendant requests permission to travel to Near Bend, Oregon, between September 25, 2022, and September 27, 2022, inclusive.

Respectfully submitted,

MICHAEL CARUSO
Federal Public Defender

s/ Eric Cohen
Eric Cohen
Assistant Federal Public Defender
Attorney for Defendant
Florida Bar No. 328065
150 West Flagler Street
Suite 1700
Miami, Florida 33130-1566
Tel: 305-530-7000
Email: Eric.Cohen@fd.org

s/Kristy Militello
Kristy Militello
Assistant Federal Public Defender
Attorney for Defendant
Florida Bar No. 0056366
450 South Australian Avenue
Suite 500
West Palm Beach, Florida 33401
Tel: 561-833-6288
Email: Kristy.Militello@fd.org

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 2, 2022, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day of all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

s/Eric M. Cohen
Eric Cohen