

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

*

v.

*

CR No. 21-cr-662-PLF

WILLARD JAKE PEART

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Defendant

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* * * * *

**DEFENDANT WILLARD JAKE PEART'S UNOPPOSED MOTION FOR PERMISSION
TO TRAVEL FOR SON'S WEDDING**

COMES NOW, the Defendant by counsel the Law Office of John S. Tatum, P. C. and requests without opposition permission to travel to Wisconsin and Idaho to attend and participate in the wedding of his son, Talmage Peart. In support of this Motion, Mr. Peart informs the Court as follows:

1. Mr. Peart's case was concluded on May 2, 2022 at which time the Court sentenced him to Probation to be supervised in his home State of Utah. Mr. Peart's Sentence included a term of sixty days Home Detention, which was commenced shortly after the Sentencing Hearing.
2. Mr. Peart's eldest son, Talmage Peart, is scheduled to be married on June 24, 2022 in or near Appleton, Wisconsin. As with many wedding celebrations, rehearsals, receptions and the like will occur on the surrounding dates in the Appleton area where the Bride's family resides.
3. A separate reception and other activities are scheduled to occur in Pocatello, Idaho, where some of Mr. Peart's family resides on June 29, 2022.

4. If the Court approves this request, Mr. Peart will travel with his wife Rachel Peart and their children. They will drive from the St. George, Utah area to the Las Vegas, Nevada Airport on June 22, 2022. They will depart Las Vegas on Delta Airlines Flight #767 at 6:10 a.m., arriving that same date. On June 25, 2022, they will fly back from Appleton, Wisconsin to Las Vegas on Delta Airlines Flight #3896 departing at 12:00 p.m. and return to their home in Toquerville, Utah that same day, barring unforeseen travel issues. While in Wisconsin, the family will stay at the Best Western Hotel, 1565 N. Federated Drive, Appleton, Wisconsin.
5. Mr. Peart will be in his hometown from June 25 – 28, 2022.
6. Again, if the Court approves this request, Mr. Peart will travel with his wife Rachel Peart and their children by car to Pocatello, Idaho on June 29, 2022 where other Peart family members who are unable to travel to Wisconsin reside. They will participate in reception activities in Pocatello with the Groom's family. Mr. Peart and Family will drive back to his hometown of Toquerville, Utah on June 30, 2022. While in Pocatello, the Peart Family will stay at the La Quinta Inn, 1440 Bench Road, Pocatello, Idaho.
7. A final reception for friends and church members of the Groom will be held in Toquerville, Utah on July 2, 2022. Mr. Peart requests permission to attend the reception and associated activities.
8. Mr. Peart is not a flight risk or a danger to the community:
 - a. Mr. Peart has been at liberty on bond since his voluntary surrender to authorities on or about April 22, 2021. Mr. Peart had no violations of his

bond conditions throughout the pendency of his case and has not violated his Probation or Home Detention conditions.

- b. Mr. Peart has been married to his wife Rachel for 22 years. They have five children two of whom are currently serving missions for the Church of Jesus Christ of Latter Day Saints and the others reside at home. See, photo of Mr. Peart and family in the photo inserted below:



9. Mr. Peart was granted permission to travel to Cancun, Republic of Mexico with his wife and business associates while his case pended, experienced no issues or difficulties and returned home as scheduled.
10. The undersigned contacted Assistant United States Attorney Brittany Reed via e-mail on May 9, 2022 regarding this request and we are authorized to state that the Government has no objection to this travel request.
11. District of Utah Probation Officer Devin Dalton has informed Mr. Peart that he has no objection to this request, but understands that overnight interstate

travel while on Home Detention requires Court approval.

12. Mr. Peart will contact his supervising Pre-Trial Officer prior to his departure and within 48 hours of his return from out of state.

13. Given that the Government does not oppose this Motion and travel arrangements and wedding activities have been long planned, we request that the Court rule thereon at its earliest opportunity without a Hearing.

14. A Proposed Order is submitted concurrently herewith.

WHEREFORE, Mr. Peart respectfully requests that the Court authorize him to travel to Wisconsin and Idaho on the dates set forth herein, to attend all of the referenced wedding ceremonies, receptions and activities and for such other and further relief as the Court deems fit in the premises.

Respectfully submitted this 4th day of June, 2022.

JOHN S. TATUM, P.C.

/s/ John S. Tatum

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CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of June, 2022 a true and correct copy of the foregoing **DEFENDANT WILLARD JAKE PEART'S UNOPPOSED MOTION FOR PERMISSION TO TRAVEL FOR SON'S WEDDING** was filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to parties of record, including the following:

Brittany L. Reed, Esq.
Assistant United States Attorney
Brittany.Reed2@usdoj.gov

/s/ John Tatum _____