

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

UNITED STATES OF AMERICA	:	
	:	
VS.	:	CRIMINAL NO. 21-271
	:	
DAWN BANCROFT	:	

ORDER

AND NOW, this day of February, 2022, upon consideration of the Defendant’s Motion for Permission to Travel, it is hereby **ORDERED** Ms. Bancroft has permission to travel from the United States to Iceland from March 19th to March 25, 2022, in the above-captioned matter.

BY THE COURT:

The Honorable Emmet G. Sullivan
United States District Court

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UNITED STATES OF AMERICA	:	
	:	
VS.	:	CRIMINAL NO. 21-271
	:	
DAWN BANCROFT	:	

DEFENSE MOTION FOR PERMISSION TO TRAVEL

NOW COMES the Defendant, Dawn Bancroft, by and through her attorney, Carina Laguzzi, and respectfully requests this Honorable Court grant her permission to travel outside of the country for a pre-paid vacation from March 19-25, 2022. In support of same, Bancroft avers as follows:

1. The Defendant was arrested¹ and charged with 18 U.S.C. § 1752(a)(1) and (a)(2) as well as 40 U.S.C. § 5104(e)(2)(D) out of her alleged action in relation to the Capitol trespassing and protest events that occurred on January 6, 2021. Ms Bancroft has since accepted responsibility for her actions by pleading guilty. She awaits sentencing by this Honorable Court later this year.
2. On February 8, 2021, Bancroft appeared in front of the Honorable Judge Robin Merriweather during which the (“regular”) terms of pre-trial release were set. ECF Docket Doc. No. 15.
3. One of the terms of pre-trial release is Bancroft is not permitted to travel outside of the United States without prior approval from this Court.

¹ The Defendant was processed at the FBI Office in Philadelphia as part of an agreement between the Special FBI Agent assigned to the case and defense counsel.

Defense is now seeking permission for travel for a pre-paid vacation.² See travel itinerary attached as Exhibit 1.

4. Shortly after her turn in, Ms. Bancroft had a prepaid vacation for a ski trip to Big Sky Montana. As a result of the more restrictive terms of pre-trial release in the Eastern District of Pennsylvania on January 29, 2021, Ms. Bancroft was not permitted to attend that trip resulting in a financial loss of a couple of thousand dollars.
5. The Iceland trip has no political motivations and Ms. Bancroft is not traveling with any other of the people involved in the January 6th incident.
6. The trip poses no danger of flight as Ms. Bancroft has a return ticket and will only be gone for a few days.
7. There is no danger to the community as Ms. Bancroft will not be in the country.
8. Defense counsel communicated with AUSA Sean Murphy on January 31st about this travel request. Though the government does oppose this request, it appears that the opposition is a Department of Justice policy versus a specific objection to this defendant's request.
9. Ms. Bancroft has been, and remains compliant, with all terms of pre-trial supervision. See Pre-Trial Services Report attached as Exhibit 2.
10. On January 31st, defense counsel contacted United States Pretrial Services Officer Masharia Holman. Ms. Holman has stated she does not object to the travel request.

² This trip was paid for in 2019 by Ms. Bancroft and was originally scheduled to occur in March 2020. It has been postponed from that time due to the pandemic caused by the COVID-19 virus which originally locked this country down in March 2020.

11. In short, there is no reason for Ms. Bancroft to not be allowed to travel as the government has not provided any specific reason(s) why Bancroft should not be allowed to travel.

WHEREFORE, for the foregoing reasons, counsel requests the Court grant Ms. Bancroft permission to travel overseas on the dates ascribed above.

Respectfully submitted,

/s/ Carina Laguzzi
CARINA LAGUZZI, ESQUIRE
Attorney for Defendant Bancroft

DATED: 02/02/2022

CERTIFICATE OF SERVICE

I, CARINA LAGUZZI, ESQUIRE, certify that on this 2nd day of February, 2022, I have served a copy of the attached Motion for Permission for Travel Travel via electronic filing thus making it available for download and printing upon the following parties:

Sean Murphy, Esquire
Assistant United States Attorney
Torre Chardon, Suite 1201
350 Carlos Chardon Street
San Juan, PR 00918

The Honorable Emmet G. Sullivan
District Court Judge
333 Constitution Avenue NW
Room 1225
Washington D.C. 20001

/s/ Carina Laguzzi
CARINA LAGUZZI, ESQUIRE
Attorney for Defendant