

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

UNITED STATES OF AMERICA

v.

ELIAS IRIZARRY

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Case: 21-cr-000282-3 (TSC)

Motion for Travel

Elias Irizarry, by and through counsel, respectfully requests that this Court grant him permission to travel to Munich, Germany with his sister, Aria Irizarry and his mother, Lorraine Irizarry for the Christmas holidays. In support of this Motion, Mr. Irizarry states the following facts.

1. Mr. Irizarry was arrested on a complaint on March 16, 2021. He was ordered released on his own personal recognizance.
2. On April 6, 2021, Mr. Irizarry was charged by information of four misdemeanor counts relating to his actions at the U.S. Capitol on January 6, 2021.
3. When he was released on March 16, 2021, Mr. Irizarry was ordered to request permission from the Court for travel outside of the continental United States. ECF No. 14.
4. Mr. Irizarry just turned 20 years old on November 17th. He is a college student at the Citadel. Since his arrest, Mr. Irizarry has made the Dean's List at school. This semester, he also earned the Gold Star, the highest academic award at his school, while earning 22 credits.
5. Mr. Irizarry has also begun to volunteer at Charleston's Veterans Hospital.
6. In addition, Mr. Irizarry has not incurred any violations during his pretrial release.

7. Mr. Irizarry's only close family is his mother, Lorraine Irizarry and his sister, Aria Irizarry, who is 24. Ms. Lorraine Irizarry is a flight attendant and due to the small size of their family, she and her two children have a family tradition of travelling over the holidays. Ex. C.
8. Mr. Irizarry requests that he be permitted to travel on the itinerary attached as Exhibit A. In short, he would fly from Columbia, SC to Munich, Germany on December 22, 2021 (arriving on December 23, 2021). He would return on December 26, 2021. He would stay at the Steigenberger Hotel, the address which is attached in Exhibit B. He would be with his family for the duration of his time in Germany.
9. Mr. Irizarry also requests permission to renew his passport in order to make his trip. He would then provide the passport to Pretrial Services within one week of his return.
10. The government opposes this Motion.

Conclusion

For the reasons set forth above, Mr. Irizarry respectfully requests that this motion be granted and that the Court permit Mr. Irizarry to travel to Germany from December 22, 2021 to December 26, 2021.

Respectfully submitted,

A. J. KRAMER
FEDERAL PUBLIC DEFENDER

/s/

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ORDER

Upon consideration of the Defendant's Motion to Travel, it is hereby ORDERED that the Motion is GRANTED and that Mr. Irizarry is permitted to travel to Germany from December 22, 2021 to December 26, 2021; it is further

Ordered that Mr. Irizarry be permitted to renew his passport; if is further

Ordered that Mr. Irizarry send his passport to the Pretrial Services Agency by January 3, 2021.

So ordered.

Date: _____

The Honorable Tanya Chutkan
United States District Court for the
District of Columbia