

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

BRADY KNOWLTON,

Defendant

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Case No. 21-CR-00046-RDM

DEFENDANT’S UNOPPOSED MOTION TO TRAVEL

TO THE HONORABLE RANDOLPH D. MOSS, UNITED STATES DISTRICT
JUDGE FOR THE DISTRICT OF COLUMBIA:

BRADY KNOWLTON, the Defendant in the above-styled and numbered cause,
by and through his undersigned counsel, requests this Court permit him to travel to
Mexico for work purposes. In support thereof, he would show the following.

1. On April 7, 2021, Mr. Knowlton was released on conditions of release that required *inter alia* that he abide by certain travel restrictions, namely, that he not travel outside the state of Utah without permission from the pretrial officer and not travel outside the United States without prior permission from the Court. (Doc. No. 16, Condition 6(b)(ii) & (iii)).
2. As confirmed at the last status hearing, Mr. Knowlton has been compliant with his conditions of release.
3. Mr. Knowlton owns multiple businesses in Mexico that require his attention. Accordingly, Mr. Knowlton is seeking permission to travel to Mexico for one week to attend to his businesses. More specifically, Mr. Knowlton wishes to travel by air

to Cancun, Mexico where he will then travel within the state of Quintana Roo to the location of his business. He will depart on August 14, 2021 and return August 21, 2021. Exact travel details and locations where he will be staying will be provided to his supervision officer.

4. Because Mr. Knowlton had to surrender his passport as a condition of his release, this travel will require the temporary release of his passport for this limited travel. Accordingly, he is seeking permission to have his supervision officer with Pretrial Services release his passport to him by on the condition that he return the passport to his supervision officer with Pretrial Services within 72 hours of his arrival back in the United States.
5. Undersigned counsel conferred with counsel for the Government, Elizabeth Kelley, and confirmed that she does not object to this motion. Undersigned counsel also conferred with Mr. Knowlton's pretrial supervision officer, Devin Dalton, and he likewise has no objection to this motion.

WHEREFORE, PREMISES CONSIDERED, Mr. Knowlton respectfully requests this Court permit him to travel to Mexico as requested and further requested permission to have his passport temporarily released to him for the limited purpose of this travel.

Date: August 9, 2021

Respectfully Submitted,

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ATTORNEYS FOR THE DEFENDANT,
BRADY KNOWLTON

CERTIFICATE OF CONFERENCE

I certify that I conferred with both Elizabeth Kelley, attorney for the Government, and Devin Dalton, Pretrial Services Officer for the District of Utah assigned to supervise Mr. Knowlton, and both do not object to his motion.

/s/ T. Brent Mayr
Brent Mayr
Attorney for Brady Knowlton

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this motion was sent to Counsel for the Government, Elizabeth C. Kelley, on August 9, 2021, via CM/ECF and by email to both her and Devin Dalton, Pretrial Services Officer for the District of Utah assigned to supervise Mr. Knowlton on the same date.

/s/ T. Brent Mayr
Brent Mayr
Attorney for Brady Knowlton