

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

ELIAS IRIZARRY

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

**Motion to Amend Order for Travel**

Elias Irizarry, by and through counsel, respectfully requests that this Court amend the Court's Order permitting him to travel, entered on December 14, 2021. 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 December 14, 2021, the Court granted him permission from the Court for travel outside of the continental United States.
3. Because of a requirement for a COVID test associated with his travel, Mr. Irizarry could not leave on December 22<sup>nd</sup>. He left on December 23<sup>rd</sup>. Moreover, many flights on the routes between Germany and the United States have been cancelled. <https://abcnews.go.com/Business/wireStory/flight-cancellations-drag-airlines-short-staffed-81940149> As a result, other flights are fully booked. Mr. Irizarry and his family fly on standby because his mother is a flight attendant.
4. Ms. Irizarry has informed counsel that the earliest flight returning to the United States is on December 28<sup>th</sup>.

5. Counsel thus writes to inform the Court of these unforeseen travel issues. Because of the continued uncertainty with air travel, counsel requests that the Order allow some flexibility given the circumstances. Specifically, counsel requests that the Order be amended to permit Mr. Irizarry return on December 28, 2021, if feasible, or in the alternative, on the next available flight thereafter.

**Conclusion**

For the reasons set forth above, Mr. Irizarry respectfully requests that this motion be granted and that the Court amend its previous Order, entered December 14, 2021.

Respectfully submitted,

A. J. KRAMER  
FEDERAL PUBLIC DEFENDER

/s/

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