

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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)	
UNITED STATES OF AMERICA)	
)	Case: 21-cr-000282-3 (TSC)
v.)	
)	
ELIAS IRIZARRY)	
_____)	

Motion for Travel

Elias Irizarry respectfully requests that this Court grant him permission to travel to Estonia to attend classes through his college for three weeks, from July 11, 2022 to July 30, 2022. 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 is a 20 years old sophomore at the Citadel. He is a Political Science major with a focus on Military and International Affairs.
5. Mr. Irizarry earned a 3.79 GPA thus far in his sophomore year, earning him the Gold Stars academic honor and a place on the Dean’s List. He was recently inducted into the national political science honor society.

6. Mr. Irizarry is also a member of the South Carolina Corps of Cadets. He was sent to Drillmaster School, which is typically reserved for the top members of his class.
7. In his spare time, Mr. Irizarry became Vice President of the Citadel Russian-Area Studies Club. He also earned a scholarship to go to a private pilot school. He also became first aid-certified and performed community service at a Veterans Administration Hospital and a local elementary school.
8. Mr. Irizarry is the recipient of several merit based scholarships including the South Carolina LIFE Scholarship, the Arrowpointe Scholarship, the American Airlines Educational Scholarship and a Marine Corps JROTC Booster Club scholarship.
9. Because of his academic successes Mr. Irizarry has earned a scholarship to attend an academic program at Tallinn University of Technology in Estonia, where he would earn 6 semester hours. See Exhibit A, B and C.
10. If the Court allows him to attend the program, Mr. Irizarry will travel to Estonia on July 10, 2022 to return on July 31, 2022. Lodging is included with tuition for the program at the University, which is located at Ehitajate tee 5, 12616 Tallinn, Estonia. Meals are also provided on campus and Mr. Irizarry will be required to follow strict rules that apply to all Citadel students.
11. In addition to his academic performance and his community service, Mr. Irizarry has not incurred any violations during his pretrial release.
12. Mr. Irizarry is attempting to graduate early for financial reasons. Although he has received a number of scholarships, he has significant financial obligations to attend college. Attendance at this program will further both his financial goal and professional goals to serve his country.
13. 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 internationally for the purpose of taking summer classes from July 11, 2022 to July 31, 2022.

Respectfully submitted,

A. J. KRAMER
FEDERAL PUBLIC DEFENDER

/s/

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