

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,                     )  
   )  
   )                     Plaintiff,                     )  
   )  
v.   )                     Case No. 1:21cr286  
   )  
JASON DOUGLAS OWENS,                     )  
   )  
   )                     Defendant.                     )  
\_\_\_\_\_

**DEFENDANT'S EMERGENCY MOTION TO TRAVEL**

TO THE HONORABLE BERYL A. HOWELL, CHIEF U.S. DISTRICT JUDGE:

Comes now the Defendant, JASON DOUGLAS OWENS, by and through his attorney of record, and requests the Court grant permission for international travel to Cabo San Lucas Mexico for purposes of attending a corporate meeting, and in support thereof, would respectfully show this Honorable Court the following:

I.

Defendant is a resident of Blanco, Texas, and works with a company by the name of Mallinckrot. Defendant requests permission to travel to Cabo San Lucas Mexico with his wife on June 5, 2022, to attend a work-related conference. Attached hereto as Exhibit A is Defendant's registration for attendance at the meeting, along with his flight information.

II.

Counsel has conferred with AUSA Jennifer Rozzoni regarding this motion, but she has not yet been able to provide the United States Attorney's position.

III.

Defendant will notify his Pretrial Services Officer of his travel and contact arrangements, and will pick up and return his passport through the Pretrial Services Office.

IV.

Defendant will abide by all other PR Bond restrictions or requests while traveling.

WHEREFORE, PREMISES CONSIDERED, Defendant prays that he be granted the privilege to travel to Cabo San Lucas Mexico for a corporate meeting under such restrictions as the Court may determine.

Respectfully submitted,

JIM DARNELL, P.C.  
310 N. Mesa, Suite 212  
El Paso, TX 79901  
Phone: (915) 532-2442  
Fax: (915) 532-4549

By: /s/Jim Darnell  
Jim Darnell  
[jdarnell@jdarnell.com](mailto:jdarnell@jdarnell.com)  
TX State Bar No. 05391250  
NM State Bar No. 148187

Attorney for Defendant

Certificate of Service

I hereby certify that on this 23rd day of May, 2022, a true and correct copy of the foregoing instrument has been filed with the Clerk of this Court using the CM/ECF system which will automatically send notification of such filing to the United States Attorney's Office.

/s/Jim Darnell

Jim Darnell

10131.1ad

EXHIBIT A

**Jim Darnell**

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**From:** jason owens <[REDACTED]>  
**Sent:** Friday, April 22, 2022 2:32 PM  
**To:** Jim Darnell  
**Subject:** Fwd: [EXTERNAL] Mallinckrodt 2021 President's Club for Jason Owens

Jim,

I hope your trial is going well.

See below, the details related to my company trip to Cabo San Lucas.

The flights will be booked soon. There is a lot of personal information on this email, so let me know if you are ok presenting this to the court, as I assume this would become public information?

Let me know how you want to proceed with getting permission from the court to attend this meeting.

Jason

Sent from my iPhone

Begin forwarded message:

**From:** "Owens, Jason" <[REDACTED]>  
**Date:** April 22, 2022 at 3:26:18 PM CDT  
**To:** "Jason Owens ([REDACTED])" <[REDACTED]>  
**Subject:** FW: [EXTERNAL] Mallinckrodt 2021 President's Club for Jason Owens

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**From:** Web Registrations <[REDACTED]>  
**Sent:** Thursday, April 21, 2022 1:31 PM  
**To:** jason.owens [REDACTED]  
**Subject:** [EXTERNAL] Mallinckrodt 2021 President's Club for Jason Owens

**EXTERNAL EMAIL: Do not click on links or attachments unless you are confident they are safe. Click the "Suspicious Email" button on the menu bar to have the message reviewed by Cybersecurity.**

<~WRD3953.jpg>

**Mallinckrodt 2021 President's Club**

June 5-10, 2022

[Return to Website](#)

Date Requested: April 21, 2022

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**REGISTRATION INFO**

**Confirmation Number:** [REDACTED]

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I **WILL** be attending.

**NAMES AS THEY APPEAR ON YOUR PASSPORT**

**Winner First Name:** Jason

**Winner Last Name:** Owens

**Guest First Name:** [REDACTED]

**Guest Last Name:** [REDACTED]

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**NAMES AS THEY'LL APPEAR IN COLLATERAL PRINT**

**Winner First Name:** Jason

**Winner Last Name:** Owens

**Guest First Name:** [REDACTED]

**Guest Last Name:** [REDACTED]

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**CONTACT INFORMATION**

**WINNER**

**Office Phone:**

[REDACTED]

**Cell Phone:**

[REDACTED]

**MNK Email Address:**

jason.owens@[REDACTED]

**Home Phone:**

[REDACTED]

**Home Address:**

[REDACTED]

**GUEST**

**Office Phone:**

[REDACTED]

**Cell Phone:**

[REDACTED]

**Email Address:**

[REDACTED]

**Home Phone:**

[REDACTED]

**Home Address:**

[REDACTED]

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**EMERGENCY CONTACT INFORMATION**

**Emergency Contact:** [REDACTED]

**Emergency Phone:** [REDACTED]

**Guest Emergency Contact:**

**Guest Emergency Phone:**

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**SPECIAL REQUESTS**

**Winner:**

Vegan, but not too crazy strict

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**HOTEL ACCOMMODATIONS**

**Hotel Check-In:**

Jun. 5, 2022

**Hotel Check-Out:**

Jun. 10, 2022

**Room Type:**

King

**FLIGHT INFO**

**Winner Birthdate:**

██████████

**Winner Seat Preference:**

aisle

**Winner KTN:**

N/A

**Winner Frequent Flyer Airline & Number:**

██████████

**Winner Preferred Airline:**

United

**Winner Airline Meal:**

None

**Guest Birthdate:**

██████████

**Guest Seat Preference:**

Next to Me

**Guest KTN:**

N/A

**Guest Frequent Flyer Airline & Number:**

██████████

**Guest Preferred Airline:**

United

**Guest Airline Meal:**

None

**Departure Date:**

Jun. 5, 2022

**Departure City:**

Houston

**Return**

**Date:**  
Jun. 10,  
2022

**Return City:**

Houston

**ACTIVITIES**

WINNER

**Day 1**

**Day 2**

**Day 3**

GUEST

**Day 1**

**Day 2**

**Day 3**

**SIZES**

**Winner T-Shirt Size:** Mens L

**Guest T-Shirt Size:** Womens S

**Winner Shoe Size:** Mens 10 1/2

**Guest Shoe Size:** Womens 7

**FAVORITE COLORS**

**Winner:** Blue

**Guest:** Green

**CELL PHONE INFO**

**Winner Cell Model:** iPhone

**Winner Cell Carrier:** AT&T

**Guest Cell Model:** iPhone

**Guest Cell Carrier:** AT&T

**BEVERAGES**

**Winner:** Yes, it is ok to deliver alcoholic beverages

**Guest:** Yes, it is ok to deliver alcoholic beverages

**Comments:**

8:22 ↶

5G 🔋

### Reservation details



## United confirmation: JM8VF4

### UA 707

**9:59 am**

**11:55 am**

IAH ----- 2h 56m ----- SJD

Houston, TX San Jose del Cabo, MX  
Sun, Jun 5, 2022 Sun, Jun 5, 2022

Operated by United Airlines

#### Flight details



JASON OWENS - 8D >

SHANNON OWENS - 8E >



CPU Eligible

### UA 1611

**1:00 pm**

**4:34 pm**

SJD ----- 2h 34m ----- IAH

San Jose del Cabo, MX Houston, TX  
Fri, Jun 10, 2022 Fri, Jun 10, 2022

Operated by United Airlines

#### Flight details



JASON OWENS - 11B >

SHANNON OWENS - 11C >



CPU Eligible