

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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UNITED STATES OF AMERICA,	:	
	:	Case No. 21-CR-00133 (JDB)
	:	
v.	:	
	:	
THOMAS FEE,	:	
	:	
Defendant.	:	
-----X	:	

**DEFENDANT’S UNOPPOSED MOTION FOR
PERMISSION TO TRAVEL TO NEW JERSEY**

Defendant, Thomas Fee, through undersigned counsel, respectfully moves for permission to travel for vacation to Long Beach, New Jersey on September 3, 2021 and to return to his residence in Long Island, New York on September 10, 2021.

In support of the motion, counsel states:

1. Mr. Fee is before the Court charged in a criminal information with four misdemeanor offenses relating to the events in the United States Capitol on January 6, 2021. Mr. Fee’s next appearance before the Court is scheduled for September 13, 2021.

2. On January 19, 2021, Mr. Fee voluntarily surrendered to law-enforcement and later that day he was presented in the Federal Court in the Eastern District of New York for a Rule 5(c)(3) hearing. Mr. Fee waived the identity hearing and was released on a fully secured Appearance Bond of \$100,000.00. On February 25, 2021 Mr. Fee made his initial appearance before the Court and the same conditions of release were continued. Since January 19, 2021 Mr. Fee has been monitored by the United States Pretrial Service Agency and he has been in full compliance with all conditions of his release.

3. Mr. Fee would like to travel by car to Long Beach, New Jersey on September 3,

2021 and return to his Long Island, New York residence on September 10, 2021. The Court previously granted Mr. Fee permission to travel to New Jersey for work purposes. On the requested trip Mr. Fee does plan on engaging in some work. However, the primary purpose of the trip is for vacation. Therefore, this request is being made.

4. Assistant United States Attorney Susan Lehr has informed the undersigned counsel that she does not oppose the requested travel. Likewise, Mr. Fee's United States Pretrial Services Officer has informed the undersigned counsel that he has no objection to the requested travel.

Wherefore, undersigned counsel respectfully moves the Court to permit Mr. Fee to travel to Long Beach, New Jersey on September 3, 2021 and to return to his residence in Long Island, New York on September 10, 2021.

DATED: August 27, 2021

Respectfully submitted,

/s/ Dennis J. Ring
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