

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

| | | |
|---------------------------------|---|-------------------------------------|
| UNITED STATES OF AMERICA |) | |
| |) | Criminal No. 21-204-01 (BAH) |
| v. |) | Chief Judge Howell |
| |) | Status: July 16, 2021 |
| MATTHEW BLEDSOE |) | |

**UNOPPOSED
MOTION TO TEMPORARILY MODIFY TRAVEL RESTRICTION
TO PERMIT SPECIAL WORK TRAVEL
AND POINTS AND AUTHORITY IN SUPPORT THEREOF**

COMES NOW the defendant, Matthew Bledsoe, by and through undersigned counsel, and respectfully moves this Honorable Court to temporarily modify his travel restriction in this case to permit him to travel for work purposes to Naples, Florida from June 22 through June 25, 2021. In support of this motion, Mr. Bledsoe would show:

1. As has been discussed at earlier hearings and verified by the Pretrial Services Agency (PSA), Mr. Bledsoe owns a moving company in Memphis, Tennessee. Most of Mr. Bledsoe's business is for moves that occur within the Memphis area. However, on occasion, Mr. Bledsoe does do moves that are outside the area.

2. Currently, as a condition of his release in this case, Mr. Bledsoe is only permitted to travel within a 150-mile radius of Memphis, Tennessee without prior approval from the Court. Mr. Bledsoe is also on GPS location monitoring.

3. Mr. Bledsoe currently has a moving job scheduled that will take him outside a 150-mile radius of Memphis from June 22 through June 25, 2021. For this job, Mr. Bledsoe will be moving a family from the Memphis area to Naples, Florida. For this move, Mr. Bledsoe will

travel from the Memphis area to Naples, Florida on June 22. He will complete the move on June 23 and June 24. He will travel back to the Memphis area on June 25.

4. On June 14, 2021, undersigned counsel spoke by phone with Assistant United States Attorneys Jamie Carter and Mitra Jafary-Hariri. Ms. Carter and Ms. Jafary-Hariri graciously indicated that the government does not oppose this motion by Mr. Bledsoe to temporarily modify his travel restrictions to permit him to travel from the Memphis area to Naples, Florida from June 22 through June 25, 2021.

5. Conditions of release can be modified by a judicial officer at any time. 18 U.S.C. § 3142(c)(3).

WHEREFORE, the defendant, Matthew Bledsoe, moves this Honorable Court to temporarily modify his travel restriction in this case to permit him to travel for work purposes to Naples, Florida from June 22 to June 25, 2021.

Respectfully submitted,

/s/
Jerry Ray Smith, Jr.
D.C. Bar No. 448699
Counsel for Matthew Bledsoe
717 D Street, N.W.
Suite 310
Washington, DC 20004
E-mail: jerryraysmith@verizon.net
Phone: (202) 347-6101