

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

UNITED STATES OF AMERICA,)	
)	
v.)	
)	CRIM NO. 21-CR-411-APM
STEWART PARKS,)	Judge: Mehta
)	Status: December 17, 2021
Defendant.)	

MOTION TO PERMIT INTERNATIONAL TRAVEL

COMES NOW Stewart Parks, by and through counsel, and moves to permit him to travel out of the country for business purposes. As reasons therefor, defendant states as follows:

1. Mr. Parks is currently charged with four misdemeanors. He is currently scheduled for a status hearing on December 17, 2021. He has been supervised by Pretrial Services since his release date of June 9, 2021. Upon information and belief, to date, Mr. Parks has been in full compliance of his release conditions and has not had any violations to date.

2. Mr. Parks is employed in the real estate business. Part of his employment includes real estate transactions both nationally and internationally. His employment necessarily requires him to have meetings and view potential properties for purchase in foreign countries.

3. Mr. Parks would like to make three international trips, all for business purposes. For his first trip, Mr. Parks desires to travel to Mexico from November 28, 2021, to December 4, 2021, for the purposes of meeting realtors and attorneys about identifying potential real estate investing property opportunities in Baja California and Quintana Roo. He will also be meeting with the American embassy in Mexico for a face-to-face meeting if necessary. He will also be touring properties listed for sale and familiarizing himself with local real estate neighborhood trends and price points in Baja California. Attached hereto as Exhibit 1 is an email showing communications with Mexican Agent Anna Salvemini. Exhibits 2 and 3 are Property Brochures from properties Mr. Parks intends to view in Tulum and Cabo San Lucas, Mexico, respectively. Exhibit 4 is Mr. Parks' flight information.

4. He also desires to travel to France from December 5, 2021, to December 8, 2021. Specifically, he plans to travel to the Overseas Collectively of France (Saint Barthelemy) to identify real estate investment opportunities. He will be meeting with credible real estate agencies such as Sibarth Real Estate. He will also be touring properties. Exhibits 5 is a property brochure from St. Bartholemy that Mr. Parks intends to tour. Exhibit 6 is Mr. Parks' flight information.

5. Finally, he also plans to travel to Brazil from December 12, 2021, to December 17, 2021. Mr. Parks plans to tour properties in Rio de Janeiro listed for sale and meet with key real estate experts. He also intends to identify real estate trends and areas of opportunity for real estate acquisition in Rio de Janeiro. Exhibit 7 is a property listing he intends to tour. Exhibit 8 is Mr. Parks' flight information. Mr. Parks will be back in time to attend his court appearance on December 17, 2021, via video conference.

6. Both counsel have spoken to Mr. Parks' Pretrial Services officer in Tennessee, who indicates that Mr. Parks is in compliance with his release conditions. Pretrial Services has also indicated that it does not oppose Mr. Parks' request.

7. Undersigned counsel has spoken to AUSA Benet Kearney, who indicates that takes no position on the motion. However, government counsel requests that if the court is inclined to grant the motion the government, they would request that Mr. Parks be required to call into Pretrial Services every other day. Mr. Parks has no objection to that requirement.

WHEREFORE, for the reasons above, Defendant Stewart Parks requests an order permitting him to travel internationally to Mexico, France, and Brazil.

Respectfully submitted,

STEWART PARKS
By Counsel

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Certificate of Service

I hereby certify that a true copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system this 21st day of November, 2021, which will send a notification of such filing (NEF) to the following to all counsel of record.

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