

**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
)	
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 from January 30, 2022 to February 10, 2022. 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 April 1, 2022. 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 has made three prior international trips which were approved by the court. There were no issues or violations with Pretrial Services during those trips.

4. Mr. Parks would like to make another international trip for business purposes. Mr. Parks intends to travel to Brazil from January 30, 2022, to February 10, 2022. Mr. Parks plans to

tour properties in São Paolo and Rio de Janeiro listed for sale and meet with key real estate experts. He also intends to identify real estate trends and tour potential properties that he may purchase. Exhibit 1 is Mr. Parks' flight departure information. Exhibit 2 is Mr. Parks' flight return information. Exhibit 3 is communications Mr. Parks has had with an agent in Brazil regarding the purpose of the trip.

6. According to a report prepared by Pretrial Services earlier this week, Mr. Parks is in compliance with all his release conditions.

7. Undersigned counsel has spoken to AUSA Benet Kearney, does not oppose, but requests that Mr. Parks be required to call into Pretrial Services every other day, as he has done in his prior trips. 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 Brazil from January 30, 2022 to February 10, 2022.

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 20th day of January 2022, which will send a notification of such filing (NEF) to the following to all counsel of record.

/s/John L. Machado
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