

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

CASE NO: 1:21-CR-677-TSC

Judge: CHUTKAN

UNITED STATES OF AMERICA

Plaintiff,

vs.

MOISES ROMERO,

Defendant.

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**MOTION TO TRAVEL WHILE ON PRETRIAL RELEASE**

The Defendant, Moises Romero, by and through the undersigned attorney, hereby moves this Honorable Court to allow the Defendant to travel, and as grounds would state the following:

1. Defendant Moises Romero was charged by way of Indictment with the following offenses: I. Civil Disorder. II Entering and Remaining in a Restricted Building or Grounds. III Disorderly and Disruptive Conduct in Restricted Building or Grounds. IV Disorderly Conduct in a Capitol Building. V Parading, Demonstrating, or Picketing in a Capitol Building.
2. The Defendant was released to pretrial services on October 12, 2021.

3. The Defendant desires to travel from Fort Lauderdale, Florida to Chattanooga, Tennessee on February 2, 2022 to February 4, 2022. Then to Gatlinburg, Tennessee on February 4, 2022 and returning back to Fort Lauderdale, Florida on February 7, 2022.
4. Attorney for the Defendant has contacted Assistant United States Attorney Robert Juman who has stated he has no objection to the granting of this motion.
5. Attorney for the Defendant has contacted Pretrial Officer Tanya Okun who has stated that Mr. Romero is in full compliance with his conditions of pretrial release and has no objection to the granting of this motion.

**WHEREFORE**, the Defendant respectfully requests this Honorable Court grant this Motion to travel.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on January 12, 2022, undersigned counsel electronically filed the foregoing document with the Clerk of Court utilizing the CM/ECF system notifying all parties of record.

Respectfully submitted,  
S/Todd A. Onore  
Todd A. Onore, Esquire  
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