

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 Orlando, Florida on March 6, 2022 and returning back to Fort Lauderdale, Florida on March 9, 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 and Substance Abuse Officer Amanda Peters who have stated they have 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  
Attorney for the Defendant  
Florida Bar No: 174610  
1144 Southeast 3<sup>rd</sup> Avenue  
Fort Lauderdale, Florida 33316  
Tel (954) 524-3800  
Fax (954) 524-3880  
[tonore@bellsouth.net](mailto:tonore@bellsouth.net)