

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.

_____ /

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 July 17, 2022; leaving from Orlando, Florida on July 21, 2022 for his sentencing in Washington D.C. on July 22, 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.

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
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