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7 UNITED STATES DISTRICT COURT  
8 FOR THE DISTRICT OF COLUMBIA

9 UNITED STATE OF AMERICA,

10 Plaintiff,

11 vs.

12 RONALD MELE,

13 Defendant

Case No.: 1:21-CR-392 (RCL)

NOTICE OF MOTION AND MOTION FOR COURT  
PERMISSION TO RELOCATE FROM THE  
CENTRAL DISTRICT OF CALIFORNIA TO THE  
WESTERN DISTRICT OF TEXAS

14 NOTICE OF MOTION

15 Defendant, Ronald Mele, files this notice of motion seeking the approval of this Court to change the location of his  
16 residence and that of his wife and family from the Central District of California to the Western District of Texas.

17 Defendant seeks this approval as soon as the Court can hear this matter. Defendant request that the court hear this  
18 motion at the next hearing on February 4, 2022.

19 Counsel has discussed this matter with the Assistant US Attorney Rita Berkower and the motion is unopposed by the  
20 Government.

21 MOTION AND POINTS & AUTHORITIES

22 Defendant request that the court grant this mouse to permit the defendant to relocate from the central District of  
23 California to the western district of Texas. Defendant in his family have resided in the central district of California  
24 for the past 32 years. However, since the indictment in this case, defendant has been left without the ability to  
25 support his family. His employment opportunities have dried up and the defendant is currently underemployed.  
26 Further, defendant children split their time between their mother and father's home. The children mother and her  
27 husband wish to relocate to Texas. defendant wishes to relocate to the same area so that the children's lives will not  
28 be disrupted. Defendant and the children's mother will reside in close proximity to one another which will permit the  
children to continue with their visitation.

NOTICE OF MOTION AND MOTION FOR COURT PERMISSION TO RELOCATE FROM THE CENTRAL  
DISTRICT OF CALIFORNIA TO THE WESTERN DISTRICT OF TEXAS - 1

1 Moreover, defendant has made preliminary inquiries to employers in the area defendant believes said his job  
2 opportunities will be significantly better in Texas than the prospects are in California.

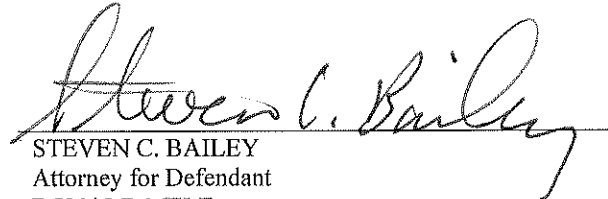
3 The Court has issued specific orders governing the defendants release, one of those orders being the location of the  
4 defendant's residence.

5 Attached is the declaration of defendant Ronald Mele, filed under seal, that describes the reasons for the move as  
6 well as the pertinent location information regarding the move.

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8 DATED: January 27, 2022

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STEVEN C. BAILEY  
Attorney for Defendant  
RONALD MELE

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