IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA
(Criminal)

UNITED STATES OF AMERICA	)	
	)	
	)	
v.	)	Criminal No. 21CR00599-RBW
	)	
	)	
DONNIE WREN	)	
Defendant	)	

MOTION TO TRAVEL AND RELOCATE FOR WORK

Comes now the defendant, DONNIE WREN, through undersigned counsel Dwight E. Crawley, and respectfully moves this Honorable Court for permission to travel and relocate for work. Mr. Wren's employment requires him to travel to Wyoming to begin an assignment on May 2, 2022. This assignment will last the entire month of May. Thereafter, he will need to travel to California for an assignment that will last until early September. Counsel has sent a copy of the defendant's work itinerary and living arrangements to AUSA Michael Romano and Pretrial Services Officer, DaShanta Valentine-Lewis. On April 27, 2022, Ms. Lewis indicated the request presented several issues of concern regarding courtesy supervision On April 28, 2022, Mr. Romano indicated that he does not oppose the request. A copy of the letter from the defendant's employer can be provided to the court upon request. It has not been attached to this public document as it provides information concerning the defendant's employment and living arrangements.

WHEREFORE, Counsel and the defendant respectfully request that this Honorable Court grant the defendant's motion to travel and relocate for work.

Respectfully submitted,
By counsel

/s/

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CERTIFICATE OF SERVICE

I hiseby certify that on the 1st day May, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification to all attorneys of record.

/s/

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