

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

Case No.: 1:22-cr-00358-RC

TRAVIS BARTOW,
Defendant.

MOTION TO PERMIT TRAVEL

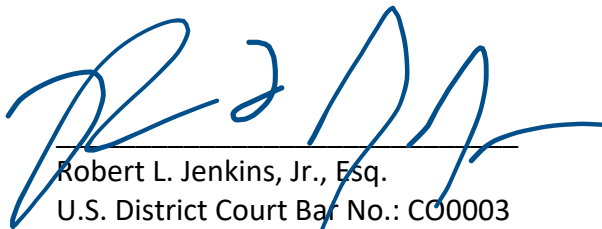
Comes now the defendant, TRAVIS BARTOW, by and through counsel and moves this Honorable Court for leave to modify his conditions of release to permit him to travel outside the United States to Aruba between March 8 to March 15, 2023. In support of which counsel states the following:

1. The defendant is currently charged with multiple misdemeanor offenses in relation to events at the U.S. Capitol taking place on January 6, 2021.
2. He is released on conditions. Among other conditions, the defendant is prohibited from traveling outside the United States.
3. To this date the defendant has been in strict compliance with his conditions of release.
4. Between March 8 to March 15, 2023, the defendant family is scheduled for a vacation in Aruba.
5. If permitted to attend the defendant would travel by airplane along with other family members on March 8, 2023. The attendees intend to leave and return on March 15, 2023.
6. Undersigned counsel has conferred with government counsel concerning this request.

The government does not object to the granting of the motion.

Wherefore, the defendant respectfully requests that his conditions of release be modified to permit him to travel to Aruba between March 8 to March 15, 2023.

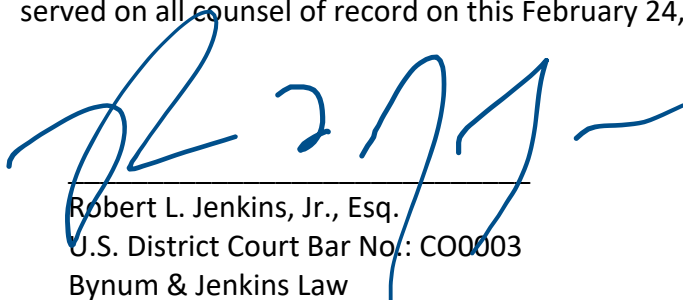
I ASK FOR THIS:



Robert L. Jenkins, Jr., Esq.
U.S. District Court Bar No.: C00003
Bynum & Jenkins Law
1010 Cameron Street
Alexandria, Virginia 22314
(703) 309 0899 Telephone
(703) 549 7701 Fax
RJenkins@BynumAndJenkinsLaw.com
Counsel for Defendant TRAVIS BARTOW

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and accurate copy of the foregoing to be served on all counsel of record on this February 24, 2023.



Robert L. Jenkins, Jr., Esq.
U.S. District Court Bar No.: C00003
Bynum & Jenkins Law
1010 Cameron Street
Alexandria, Virginia 22314
(703) 309 0899 Telephone
(703) 549 7701 Fax
RJenkins@BynumAndJenkinsLaw.com
Counsel for Defendant TRAVIS BARTOW