IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA	*	
v.	*	**Criminal No.: 22-mj-01286-JMC**
AHMED SARY	*	

* * * * * * * * * * * *

CONSENT MOTION FOR ACCESS TO SURRENDERED PASSPORT

The Defendant, Ahmed Sary, by and through counsel, Julie M. Reamy, respectfully moves for an order of this Court authorizing the United States District Court Clerk's Office to access the surrendered passport of his son, Mohamed Sary, and to provide photocopies of said passport to the Defendant.

1. Mr. Sary was released from detention with conditions in this case on May 13, 2022. See ECF No. 30.
2. On May 9, 2022, Mr. Sary surrendered his U.S. Passport as well as those of his wife and three children. See ECF Nos. 19-23. One of the surrendered passports belongs to Mr. Sary's adult child, Mohamed Sary.
3. Mohamed Sary wishes to apply for employment in Baltimore, which requires that he show proof of his United States citizenship. The only way in which Mohamed Sary can satisfy that requirement is to attach a copy of his passport to the employment application. If Mohamed Sary is offered the position in the future, he will have to produce the original passport to the potential employer for inspection. While Mr. Sary is not requesting physical possession of the passport at this time, he may request a temporary return of the passport to present to the potential employer if an offer of employment is extended to him in the future.

4. The application submission deadline is July 6, 2022.
5. The Defendant, Ahmed Sary, respectfully requests that the Court issue an order authorizing the U.S. District Court Clerk's Office to access Mohamed Sary's surrendered passport and directing that office to photocopy 1) the front page bearing Mohamed Sary's photograph and personal identifying information 2) the back page bearing the passport's bar code and PPN, and 3) provide the photocopies to the Defendant, Mohamed Sary, or undersigned counsel.
6. Undersigned has discussed this request with Assistant U.S. Attorney, Paul Riley, who has advised that the Government is not opposed.

WHEREFORE the Defendant prays that the Court grant his request and issue the attached proposed order.

Respectfully submitted,

/s/ *Julie M. Reamy*
Julie M. Reamy
Federal Bar No. 28232
JULIE M. REAMY | Attorney At Law, LLC
210 Allegheny Avenue, Suite 100
Baltimore, Maryland 21204
Ofc: (410) 605-0000
Fax: (410) 697-4006
Email: juliereamy@gmail.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 6th day of July 2022, this document was filed with the Clerk of U.S. District Court and a copy served upon, Assistant United States Attorney, Paul Riley.

/s/ *Julie M. Reamy*
Julie M. Reamy