

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA

versus

ANTONIO HOSEY

Criminal Action No.:
1:20-CR-00396-LMM

UNOPPOSED MOTION TO PERMIT TRAVEL

COMES NOW Defendant, ANTONIO HOSEY, by and through undersigned counsel, and requests that this Court allow him to travel to Elizabeth City, North Carolina from November 22, 2022 to November 29, 2022 for a family trip to celebrate the Thanksgiving holiday.

(1)

Mr. Hosey made his initial appearance on October 21, 2022. (Doc. 4). He waived his right to grand jury indictment and was arraigned on a criminal complaint charging him with one count of conspiring to commit wire fraud and money laundering. *Id.* He was granted an unsecured bond in the amount of \$10,000.¹ He entered a plea of guilty on November 19, 2020. (Doc. 8). On November 16, 2022, Mr. Hosey was sentenced to twelve months and one day of imprisonment to be

¹ (Doc. 4-5). The government did not oppose bond in Mr. Hosey's case.

followed by three years of supervised release. (Doc. 24). The court ordered that he surrender himself to serve his sentence no earlier than January 15, 2023. *Id.*

(2)

Since his release on bond, Mr. Hosey has followed all terms and conditions of his release.

(3)

Mr. Hosey's bond conditions specifically allow him to travel to the Eastern District of North Carolina to visit family without the prior approval of pretrial services. (Doc. 6 at 2). However, given that he has now been sentencing and is awaiting his surrender date, Mr. Hosey is requesting permission for this trip in an abundance of caution. At Mr. Hosey's sentencing hearing, the government indicated that they had no objection to the proposed travel.

(4)

WHEREFORE, Mr. Hosey respectfully requests that this Court order that he be allowed to travel to Elizabeth City, North Carolina for a family trip beginning November 22, 2021 through and including November 29, 2021.

Dated: This 18th day of November, 2022.

Respectfully Submitted,

/s/ Caitlyn Wade

Caitlyn Wade

Georgia Bar No. 259114

Attorney for Mr. Hosey