

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 8:21-cr-370-CEH-JSS

BRIDGITTE KEIM

UNITED STATES' RESPONE TO DEFENDANT'S
PRO SE MOTION TO TRAVEL

The United States of America, by Roger B. Handberg, United States Attorney for the Middle District of Florida, respectfully files this response to defendant Keim's *pro se* Motion to Travel (hereinafter "Motion"). (Doc. 34).

On January 16, 2024, the defendant filed her Motion seeking approval for the following overseas trips:

1. Travel to the Dominican Republic from February 12, 2024, through February 16, 2024; and
2. Travel to Nova Scotia, Canada July 17, 2024, through August 17, 2024.

Undersigned counsel contacted United States Probation Officer Amanda Goble to ascertain her position for both travel requests. On February 2, 2024, undersigned counsel received a written response from USPO Goble. Ms. Goble advised that she had spoken with Ms. Keim about the proposed overseas travel. Regarding the proposed trip to the Dominican Republic, Ms. Goble advised that Ms. Keim's travel plans to the Dominican Republic are no longer valid as Ms. Keim has

already canceled her trip. Regarding the trip to Nova Scotia, Canada, Ms. Gorman verified Ms. Keim's travel arrangements and has no objection to the proposed travel.

Based on conversations with Ms. Gorman the United States respectfully requests that the Court deny the defendant's Motion in part regarding travel to the Dominican Republic as Keim has canceled her travel and grant the defendant's Motion in part to travel to Nova Scotia, Canada.

Respectively submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on February 2, 2024, the foregoing document was filed under seal with the Clerk of the Court, and a true copy was furnished by United States Mail to the following:

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