

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 24-CR-60003-Williams/Hunt**

UNITED STATES OF AMERICA

Vs.

ERNEST BERNARD GONDER JR.,

Defendant.

_____ /

MOTION TO TRAVEL

COMES NOW, the Defendant, ERNEST BERNARD GONDER JR., (“Mr. Gonder”) by and through undersigned counsel who respectfully requests permission for Mr. Gonder to travel while out on bond to attend his son’s basketball game and to assist a second son with a move. As grounds therefore undersigned would state as follows:

1. Mr. Gonder’s son, Johnathon Gonder, plays basketball for the Strive 4 Excellence team.

Mr. Gonder is requesting permission to travel for his son’s basketball games for the season pursuant to the season schedule (Attached hereto as Exhibit A).

2. Mr. Gonder’s second son, Ernest Gonder III, recently moved to Atlanta, Georgia to attend Gupton Jones College and is moving into a new apartment. Mr. Gonder is requesting permission to travel to provide his son assistance with the move between March 29 – March 31.

3. Undersigned counsel has spoken to AUSA Marc Anton who does not object to this Motion.

WHEREFORE undersigned counsel respectfully requests this instant motion be **GRANTED**.

Dated: March 8, 2024.

Respectfully submitted,

Michael B. Cohen

Michael B. Cohen, Esq.

Florida Bar No: 210196

6400 North Andrews Ave., Ste 505

Fort Lauderdale, Florida 33309

Ph (954) 928-0059

Email: micheal@mcohenlaw.com

Email: eservice@mcohenlaw.com

EXHIBIT A

STRIVE 4 EXCELLENCE

YELLOW

Season Schedule
2023 - 2024

STRIVE 4 EXCELLENCE YELLOW Season Schedule 2023 - 2024			
Dates	Tournament	Contact / Circuit	Location
March 9 - 10, 2024	The Tournament Challenge	Premier Tournament Group	Fort Pierce, FL
March 23 - 24, 2024	SF Youth Showdown	Marcus McGee	Fort Lauderdale, FL
April 6 - 7, 2024	Florida Flight Elite's AAU Battle Royal	Florida Flight Elite	Coral Springs, FL
April 13 - 14, 2024	AAU Chasing The Chains (SOUTH FL)	Hoopfluence	Coral Springs, FL
April 19 - 21, 2024	Summer Jam	On The Radar Hoops	Atlanta, GA
April 26 - 28, 2024	Hall of Fame Basketball Circuit	North Florida Hoop Group	Deerfield, FL
May 3 - 5, 2024	Battle at the Beach	On The Radar Hoops	Daytona, FL
May 25 - 27, 2024	AAU Memorial Day Classics	AAU Basketball	ESPN Orlando, FL
July 6 - 7, 2024	Carolina Mayhem	On The Radar Hoops	Greensboro, NC
July 19 - 21, 2024	Florida Showdown (NCAA Live Period)	Source Hoops	Orlando, FL
July 26 - 28, 2024	The Final Run	On The Radar Hoops	Wesley Chapel, FL