

**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.

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**AMENDED MOTION TO TRAVEL**

**COMES NOW**, the Defendant, ERNEST BERNARD GONDER JR., (“Mr. Gonder”) by and through undersigned counsel who respectfully submits an Amended Motion to Travel to include a revised season schedule to attend his son, Johnathon Gonder’s basketball games. As grounds therefore undersigned would state as follows:

1. This Honorable Court issued an Order on March 11, 2024, granting Mr. Gonder’s Motion to Travel.
2. Mr. Gonder Amends the Motion to travel to include a revised season schedule for his son’s basketball games (Attached hereto as Exhibit A).
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 12, 2024.

Respectfully submitted,

**Michael B. Cohen**

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# **EXHIBIT A**

STRIVE 4 EXCELLENCE  
YELLOW

Season Schedule  
2023 - 2024

| Dates               | Tournament                          | Contact / Circuit             | Location           |
|---------------------|-------------------------------------|-------------------------------|--------------------|
| March 8 - 10, 2024  | Sarasota Xplosion Shootout          | Florida US Amateur Basketball | Sarasota, FL       |
| March 23 - 24, 2024 | Naples Beach Showcase               | Florida US Amateur Basketball | Naples, FL         |
| April 6 - 7, 2024   | SCE Gasparilla Hoopfest             | Florida US Amateur Basketball | Tampa, FL          |
| April 12 - 14, 2024 | Charlotte County Shootout           | Florida US Amateur Basketball | Port Charlotte, FL |
| April 19 - 21, 2024 | Summer Jam                          | On The Radar Hoops            | Atlanta, GA        |
| April 26 - 28, 2024 | Hoopseen FL Cup I                   | Florida US Amateur Basketball | Wesley Chapel, 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  |
|                     |                                     |                               |                    |