

Condition 7h3 requires as follows:

Travel is restricted to: **the island of Oahu.**

Dkt. No. 8, ¶ 7h3 (emphasis in original).

Defendant's elderly parents have been subpoenaed to testify before a Grand Jury in Washington, D.C. in an unrelated matter from October 19, 2021 to October 22, 2021. Defendant's parents have retained counsel in that matter who has tried to arrange for their testimony to be taken remotely to avoid Defendant's parents having to travel to Washington, D.C. Unfortunately, those efforts have been unsuccessful. Defendant's counsel discussed this matter with Government's counsel in an attempt to agree to a Stipulation to allow Defendant to accompany his parents to Washington, D.C. from October 19, 2021 to October 22, 2021. Unfortunately, an agreement could not be reached. Thus, Defendant is filing the instant Motion.

Defendant's parents are elderly with health issues and require wheelchair transport. Defendant's parents also have a language barrier in that English is not their primary language. As such, traveling alone in the middle of a pandemic will be burdensome for Defendant's parents and they need Defendant to accompany them in their travels to Washington, D.C. Defendant's parents flight to Washington, D.C. includes a short layover in Dallas/Fort Worth, Texas resulting in an approximately an over 10 hour flight time. Defendant's parents flight from

Washington, D.C. back home to Honolulu includes a short layover in Phoenix, Arizona resulting in an over 11 hour flight time. Should the Court grant the instant Motion Defendant will (i) provide Pretrial Services with his itinerary and lodging information and (ii) continue to comply with all other terms and conditions of his release.

Consequently, Defendant respectfully requests that this Honorable Court amend Condition 7h3 to allow Defendant to accompany his parents to Washington, D.C. from October 19, 2021 to October 22, 2021. Moreover, because of the timeliness of Defendant's parents' trip, Defendant also respectfully requests that the Court expedite the hearing on the instant motion.

DATED: Honolulu, Hawaii, October 13, 2021.

/s/ Victor J. Bakke

VICTOR J. BAKKE

Attorney for Defendant
MARTIN KAO