UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

UNITED STATES OF AMERICA,

v. **CASE NO.: 3:24-cr-166-TJC-LLL**

KEVIN KARL WILLS, JR.,

Defendant.

DEFENDANT'S MOTION TO ENLARGE TRAVEL RESTRICTIONS

Defendant, Kevin Karl Wills, Jr., by and through undersigned counsel, hereby moves this Honorable Court for its Order enlarging Defendant's travel restrictions so that he may attend an eviction hearing in Rhode Island on January 15, 2025. In support thereof, Defendant states:

1. Defendant is charged by Information with Conspiracy to Defraud the United States. (Doc. 1).

2. Defendant entered a guilty plea on November 25, 2024 (Doc. 15) and an Order Setting Conditions of Bond was entered the same day (Doc. 16). A condition of bond is that Defendant's travel is restricted to the Middle District and Southern District of Florida.

3. The plea was accepted by the Court on December 5, 2024 (Doc. 21).

4. Defendant is a landlord to a property in Providence, Rhode Island and is required to appear at an eviction hearing for non-payment scheduled for January

15, 2025. *Kevin Wills v. Franchesca Rivera*, Civil Action File No.: 3CA-2025-0065, Rhode Island District Court, Noel Judicial Complex. It is Mr. Wills' intention to use the proceeds from a sale of this property in order to satisfy his obligations under his Plea Agreement.

5. Defendant desires to depart from Florida on January 14, 2025, and return to his residence on January 16, 2025.

6. Defendant proposed the following travel schedule for the Court in the hope that the Court will approve such travel:

a. Defendant desires to depart from Fort Lauderdale, Florida on January 14, 2025, and stay at a local hotel in Providence, Rhode Island.

b. On January 15, 2025, Defendant will attend the eviction hearing in Rhode Island at the Noel Judicial Complex in Warwick, Rhode Island.

c. On January 16, 2025, Defendant will return to his residence in Fort Lauderdale, Florida.

7. Undersigned counsel has conferred with Assistant United States Attorney Arnold Corsmeier and is authorized to represent that the Government does not oppose the relief requested herein.

WHEREFORE, Defendant, Kevin Karl Wills, Jr., respectfully requests that this Honorable Court enter its Order authorizing Defendant to travel to Rhode Island for the eviction hearing in accordance with the schedule set forth above.

Respectfully submitted,

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COUNSEL FOR DEFENDANT

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished **Arnold B. Corsmeier, Esquire, Assistant United States Attorney**, chip.corsmeier@usdoj.gov, and **Jennifer Michele Harrington, Esquire, Assistant United States Attorney**, Jennifer.harrington2@usdoj.gov, via the CM/ECF system, this 8th day of January, 2025.

ATTORNEY