UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 6:21−cr−00141−RBD−EJK
	)	
EMMET BOWENS,	)	
	)	
Defendant.	)	
	)	

DEFENDANT EMMET BOWENS' MOTION SEEKING APPROVAL OF HIS CHANGE OF ADDRESS AND PERMISSION TO STAY IN A HOTEL WHILE HE IS TEMPORARILY BETWEEN ADDRESSES

The Defendant, Emmet Bowens ("Mr. Bowens"), by and through the undersigned counsel, hereby moves for an Order from this Honorable Court approving his change of address, and granting him permission to stay in a local hotel while he is temporarily between addresses. In support thereof, Mr. Bowens states as follows:

1. On November 10, 2021, a federal grand jury in the Middle District of Florida returned an indictment charging Mr. Bowens with two counts of wire fraud, in violation of 18 U.S.C. § 1343 (Counts One and Two), and four counts of money laundering, in violation of 18 U.S.C. § 1957 (Counts Three through Six). Doc. 1.

2. On December 2, 2021, in Atlanta, Georgia, Mr. Bowens was detained and eventually arrested in connection with a warrant issued in this case. Docs. 7, 9.

3. On the same date of his arrest, December 2, 2021, Mr. Bowens had a Rule 5(c)(3) initial appearance before a U.S. Magistrate Judge in the Northern District of Georgia. Doc. 7. At this hearing, the Magistrate Judge set conditions of release for Mr. Bowens, including, *inter alia*, the requirement that he appear in all proceedings in this case as directed, that he be supervised by Pretrial Services, that he participate in GPS location monitoring, and that he immediately advise the Court, defense counsel, and the U.S. Attorney in writing before any change in address. *Id.* at 4, 7. The conditions of release also required Mr. Bowens to reside at the address provided to pretrial services and required him not to change his address without prior approval from the Court. Id. at 7.

4. On December 16, 2021, Mr. Bowens appeared in the Middle District of Florida, where this Court held an in-district initial appearance in Mr. Bowens' case. Doc. 10. At this hearing, Mr. Bowens made an *ore tenus* motion to modify his conditions of release, specifically, to remove the condition of GPS monitoring. Docs. 10, 14. The Court denied Mr. Bowens' *ore tenus* motion to modify the conditions of his release. Doc. 15.

5. On April 21, 2022, Mr. Bowens filed a renewed motion to modify his conditions of release, specifically to remove the condition of GPS monitoring. Doc. 40.

6. On May 16, 2022, this Court denied Mr. Bowens' renewed motion to modify his conditions of release. Doc. 54.

7. Thus, Mr. Bowens' conditions of release remain as they were originally set by the court following his arrest on December 2, 2021.

8. Since his initial appearance before this Court on December 16, 2021, Mr. Bowens has been living at his residence in Apopka, Florida. Mr. Bowens and his family are selling their home in Apopka and relocating to an apartment complex located at 6265 West Sand Lake Road, Orlando, Florida 32819. However, while he and his family are between addresses, they will be staying at the Hyatt Regency Orlando, located at 9801 International Drive, Orlando, Florida 32819, starting on June 8, 2022 and continuing through July 13, 2022. [1]

9. Consistent with his current conditions of release, Mr. Bowens, through the undersigned, has hereby notified the parties and the Court, in writing, of Mr. Bowens' upcoming change of address.

[1] The undersigned filed this motion immediately upon learning on June 8, 2022, that Mr. Bowens' address would be changing, and that Mr. Bowens would need to stay temporarily at a hotel.

10. Further, Mr. Bowens seeks approval from this Court to change his address to the aforementioned apartment complex. Lastly, Mr. Bowens requests permission to stay at the aforementioned local hotel while he is temporarily between addresses.

11. On June 8, 2022, the undersigned conferred with Assistant United States Attorney Amanda Daniels and Pretrial Services Officer Charles Sweatt about the instant motion. The undersigned has been informed that neither the government, nor Pretrial Services opposes the relief sought herein.

WHEREFORE, the Defendant, Emmet Bowens, moves this Honorable Court for an Order granting him approval to change his address to an apartment complex located at 6265 West Sand Lake Road, Orlando, Florida 32819, and granting him permission to stay at the Hyatt Regency Orlando, located at 9801 International Drive, Orlando, Florida 32819, starting on June 8, 2022 and continuing through July 13, 2022, while he is temporarily between addresses.

Respectfully submitted on this 7th day of June, 2022.

s/Andrew C. Searle
ANDREW C. SEARLE, ESQ.
Florida Bar No. 0116461
SEARLE LAW P.A.
200 East Robinson Street, Suite 1150
Orlando, Florida 32801
Telephone: 407-203-3715
Email: andrew@searle-law.com
Attorney for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY on June 7, 2022, I filed a copy of the foregoing with the Clerk of the Court via the CM/ECF system. I further certify that all parties to this case are equipped to receive service of documents via that system.

s/Andrew C. Searle
ANDREW C. SEARLE, ESQ.
Florida Bar No. 0116461
SEARLE LAW P.A.
200 East Robinson Street, Suite 1150
Orlando, Florida 32801
Telephone: 407-203-3715
Email: andrew@searle-law.com
Attorney for Defendant