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' UNOPPOSED MOTION SEEKING APPROVAL FROM THE COURT TO TRAVEL OUTSIDE THE MIDDLE DISTRICT OF FLORIDA TO ATTEND A FAMILY FUNERAL

The Defendant, Emmet Bowens ("Mr. Bowens"), by and through the undersigned counsel, hereby moves for an Order from this Honorable Court granting him permission to travel to Mississippi to attend his aunt's funeral. Mr. Bowens respectfully requests to be outside the Middle District of Florida to attend this family funeral, starting on Thursday, February 23, 2023, with a return date of Monday, February 27, 2023. 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 U.S. Pretrial Services, that he participate in location monitoring, and that he remain within the jurisdiction of the Northern District of Georgia and the Middle District of Florida "unless pre-approval from . . . Pretrial Services is received." *Id.* at 4, 7.

4. On December 16, 2021, Mr. Bowens appeared in the Middle District of Florida, where this Court held an in-district initial appearance. Doc. 10. Mr. Bowens' conditions of release remain as they were originally set by the court in the Northern District of Georgia. *See* Docs. 10, 14, 15, 40, 43, 54.

5. Mr. Bowens has fully complied with all conditions of release since his arrest.

6. On February 20, 2023, Mr. Bowens informed the undersigned that he would like to attend his aunt's funeral in Mississippi. Mr. Bowens plans to travel to Mississippi on Thursday, February 23, 2023, where he will stay at the TownePlace Suites, located at 7840 Craft-Goodman Frontage Road, Olive Branch Mississippi 38654. Mr. Bowens will return to the Middle District of Florida on Monday, February 27, 2023.

7. As noted above, Mr. Bowens' pretrial release conditions require him to seek pre-approval from the U.S. Pretrial Services Office before leaving the Middle District of Florida.

8. On February 20, 2023, the undersigned emailed Mr. Bowens' U.S. Pretrial Services Officer and requested permission for Mr. Bowens to travel out-of-district to attend the family funeral, as described above.

9. On February 21, 2023, the U.S. Pretrial Services Officer informed the undersigned that, because Mr. Bowens was on location monitoring, a motion had to be filed with the Court seeking approval of the requested out-of-district travel.

10. On February 21, 2023, the undersigned conferred with Assistant United States Attorney Chauncey Bratt who informed the undersigned that the government does not oppose the relief requested herein.

WHEREFORE, the Defendant, Emmet Bowens, moves this Honorable Court for an Order granting him permission/authorization to travel from the Middle District of Florida to Mississippi (and through those locations directly in between on the route of travel), starting on Thursday, February 23, 2023, with a return date of Monday, February 27, 2023.

Respectfully submitted on this 21st day of February, 2023.

s/Andrew C. Searle
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY on February 21, 2023, 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
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