

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

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<b>UNITED STATES OF AMERICA</b>	)	
	)	
<b>v.</b>	)	<b>Case. No. 21-287-1 (TNM)</b>
	)	
<b>KEVIN SEEFRIED</b>	)	
	)	
<b>Defendant.</b>	)	
_____	)	

**DEFENDANT’S UNOPPOSED MOTION FOR PERMISSION  
TO TRAVEL TO NORTH CAROLINA**

Defendant, Kevin Seefried through undersigned counsel, respectfully moves for permission to travel outside of the District of Delaware, specifically to Salvo, North Carolina on May 15, 2021 and to return to his residence in Delaware on May 22, 2021.

In support of the motion, counsel states:

1. Mr. Seefried is before the Court charged in a five-count indictment relating to the events in the United States Capitol grounds on January 6, 2021. ECF. 20. Mr. Seefried will appear before the Court for a Status Conference on Tuesday, May 4, 2021.
2. On January 13, Magistrate Judge Robin M. Meriweather issued a warrant for Mr. Seefried’s arrest pursuant to a criminal complaint based on the events later charged in the indictment. On January 14, 2021, Mr. Seefried was arrested and presented in the Federal Court for the District of Delaware for a Rule 5(c)(3) hearing. Mr. Seefried waived his identity hearing and the government did not seek his pretrial detention. From January 14, 2021, Mr. Seefried was supervised by that Court’s Pretrial Service Agency without incident.
3. On January 25, 2021, Mr. Seefried appeared before Magistrate Judge Faruqui for his initial appearance. During the hearing, Mr. Seefried waive his preliminary hearing and

moved to exclude time under the Speedy Trial Act. The Court continued Mr. Seefried on his personal recognizance without objection from the government. Consistent with his compliance before the District Court for Delaware, Mr. Seefried has abided by all the conditions of release ordered by Magistrate Judge Faruqui.

4. Mr. Seefried would like to travel with his family by car to Salvo, North Carolina on May 15, 2021 and to return to Delaware on May 22, 2021. The family trip to North Carolina was originally scheduled for May 2020 but was cancelled in response to the pandemic.

5. Assistant United States Attorney Brittany Reed has informed undersigned counsel that she does not oppose Mr. Seefried' permission for travel.

Wherefore, undersigned counsel respectfully moves the Court to permit Mr. Seefried to travel to Salvo, North Carolina on May 15, 2021 and to return to his home in Delaware on May 22, 2021.

Respectfully submitted,

A.J. Kramer  
Federal Public Defender

\_\_\_\_\_/s/\_\_\_\_\_  
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