

**IN THE UNITED STATE DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA:

v.

RUSSELL TAYLOR, Defendant

CASE NO. 21-CR-392 (RCL)

**MOTION TO ALLOW TRAVEL**

**HONORABLE ROYCE C. LAMBERTH  
UNITED STATES DISTRICT JUDGE**

Defendant Russell Taylor, through his counsel, files this request to travel to Maryland and Washington D.C. for the dates of January 16 to 21, 2025. The purpose of his travel is to take his wife and children to the Presidential Inauguration. Mr. Taylor and his family have been personally invited by Utah Congressman Chris Stewart (Ret) to attend the event. A letter to the Court indicating this invitation is attached. Also attached is his planned itinerary. The majority of his travel will be spent outside of the city in Maryland.

Mr. Taylor has successfully completed his home confinement and is in compliance with his terms and conditions of probation. During the pendency of this case he has been permitted to travel to Washington D.C. no less than 6 prior times for Court and government business related to the case. At no time has Mr. Taylor failed to perform any of his obligations to the government or this Court in full. This Court is fully aware of Mr. Taylor's record with the Court concerning this case. Over the past four years Mr. Taylor has remained compliant with all Court Orders and has not given any indications of trouble or concern. In all prior requests the government has agreed to travel to Washington D.C. as well as Utah, Nevada, and Arizona.

Counsel submits that Mr. Taylor does not pose any risk or concern for this travel request. He is traveling with his family including minor children. He is the guest of a former Congressman, and has demonstrated over and over again that he is trustworthy in his travel and compliance with Court Orders. We hereby request he be allowed to travel to Washington D.C. from January 16 to 21, 2025.

Respectfully Submitted,



Dyke E. Huish  
Attorney for Russell Taylor