



MATTHEW L. SCHWARTZ  
Tel.: (212) 303-3646  
E-mail: mlschwartz@bsflp.com

August 3, 2021

**BY ECF**

Hon. Brian M. Cogan  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *United States v. Alshahhi, et al.*, 21 Cr. 371 (BMC) (TAM)**

Dear Judge Cogan:

I represent Matthew Grimes, one of the defendants in the above-referenced case. I write to respectfully request the Court's permission for Mr. Grimes to travel to New York and Boston. Both the Court's Pretrial Services Officer and the Government have been provided a copy of Mr. Grimes' proposed itinerary, and both consent to this request.

By way of background, Mr. Grimes was charged in Counts 1 and 2 of the above-referenced indictment and first appeared in the Central District of California late last month, where he was released on an agreed-upon bail package. Last Monday, he appeared for the first time in this District. At that appearance, Judge Bulsara adopted an agreed-upon bail package consisting primarily of (1) a \$5 million bond partially secured by Mr. Grimes's parents' house and three co-signors; (2) GPS location monitoring; and (3) a curfew as directed by Pretrial. Mr. Grimes also surrendered his passport, and his travel was limited to the Eastern and Southern Districts of New York and the Central District of California, among other conditions. Mr. Grimes is scheduled to make his first appearance before Your Honor, telephonically, on September 2, 2021.

The proposed trip to New York and Boston would be from August 4 or 5 (depending on when the Court is able to act on this request) to 10, 2021, and the purpose of the trip is to meet with counsel. While travelling, Mr. Grimes would continue to be subject to GPS monitoring and would report to his Pretrial Services Officer as directed. Combined with the other conditions of his release including a substantial secured bond, I respectfully submit that Mr. Grimes is no risk of flight. He has, after all, already travelled once cross-country to appear in this District, and did so without incident.



Accordingly, on behalf of Mr. Grimes, I respectfully request that he (1) be permitted to travel to the District of Massachusetts; (2) be relieved from his curfew condition<sup>1</sup> while in New York and Massachusetts; and (3) be permitted to travel by rail<sup>2</sup> between New York and Boston – all subject to the Government and Pretrial Services having a copy of his itinerary.

Thank you for your consideration of this request.

Respectfully,

/s/ Matthew L. Schwartz  
Matthew L. Schwartz

cc: Counsel of record (by ECF)  
Pretrial Services (by e-mail)

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<sup>1</sup> Mr. Grimes is not planning any wild nights out. We ask for relief from the curfew condition at the instruction of Pretrial Services, because the current curfew condition requires Mr. Grimes to spend each night at either his own or his parents' residence, both of which are in the Central District of California. Obviously he cannot comply with that condition while on the East Coast.

<sup>2</sup> One of Mr. Grimes's release conditions is that he travel "only by road or common air carrier." The purpose of this condition was to ensure that Mr. Grimes did not travel by private airplane (not that he has access to one), but it also seemingly forbids travel by common rail carrier.