

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 17-20317-CR-GAYLES/OTAZO-REYES

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL FRESHKO,

Defendant.

_____ /

MOTION FOR PERMISSION TO TRAVEL

Defendant, MICHAEL FRESHKO, moves this Court to enter an Order allowing him to travel from his home in the Southern District of Florida to visit the tourist attractions in the Orlando, Florida, area, and in support of this request submits the following:

1. Freshko would like to take his live-in girlfriend and, more significantly, her 9-year old daughter on this trip commencing June 18, 2017, and returning on June 21, 2017. While in the Orlando area Freshko plans to stay at the Sheraton Vistana Resort Villas, 8800 Vistana Centre Drive, Orlando, Florida 32821, Telephone No. 407-239-3100.

2. On May 12, 2017, this Court released Freshko on a \$100,000.00 personal surety bond. The parties stipulated to this bond. Well before then, Freshko had become aware of the investigation that resulted in the filing of a one-count Information in this case. Nothing has occurred at any time in this case that suggests Freshko is a risk of flight or a danger to the community or would become one if he is allowed to take his live-in girlfriend and her 9-year old daughter on this trip.

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3. Teresa Nair, Freshko's Pre-Trial Services officer has advised she has no objection to Freshko taking this trip. Michael Davis, Esq., the prosecutor handling this case, has authorized the undersigned to advise this Court the government's position in this matter mirrors that of Pre-Trial Services.

Respectfully submitted,

/s/ Joel Kaplan

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed with the Clerk of the Court via cm/ecf this 12th day of JUNE, 2017.

/s/ Joel Kaplan

Joel Kaplan, Esq.