

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff,

V.

WANDA VAZQUEZ GARCED,

Defendant.

CRIMINAL NO. 22-cr-0342-01 (RAM)

MOTION TO TRAVEL

TO THE HONORABLE COURT:

COMES NOW defendant WANDA VAZQUEZ GARCED, by and through her attorneys, and most respectfully STATES, ALLEGES and PRAYS:

1. Governor Wanda Vazquez Garced (“Vazquez-Garced”) is required to request the Court’s prior approval before traveling outside the jurisdiction. See: D. 14, *Order Setting Conditions of Release 7(f)*.
2. Vazquez-Garced has an upcoming family / religious pilgrimage to Spain during March 31 – April 11, 2023 (*Semana Santa*). She and her husband have reservations on Iberia’s flight IB6300 from San Juan to Madrid and will return on flight IB6301 back to San Juan. Copies of her flight itinerary have been provided to the government and to the USPO.
3. Counsel has spoken with the government and the probation officer and neither has an objection to her trip.
4. Vazquez-Garced’s passport is currently under the custody of the United States

Probation Office. The USPO needs approval from this Court to release her passport. She will immediately surrender her passport upon her return.

5. We recognize that this type of motion is rarely, if ever, filed with restrictions for a non-cooperating defendant. However, given that Vazquez-Garced is a public figure and all her filings are subject to heightened scrutiny by the press and the public, we filed this Motion with restrictions. The reason is to ensure her safety, avoid public demonstrations (both for or against her) at the airport and prevent unwarranted and prejudicial attacks in the media that could be instigated by her travel plans.

WHEREFORE, we respectfully pray from this Honorable Court to GRANT this motion, and, accordingly, (1) grant permission to Vazquez-Garced to travel to Spain during March 31 – April 11, 2023, (2) order the USPO to provide her with her passport and (3) order Vazquez-Garced to once more surrender her passport to the USPO upon her return.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, March 6, 2023.

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Motion to Travel

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Attorneys for Wanda Vazquez Garced

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this same date, the undersigned attorney filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel for all parties in this action.

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