

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

| | | |
|---------------------------------|---|--|
| UNITED STATES OF AMERICA |) | |
| |) | |
| v. |) | Criminal Case No: 1:21-MJ-00035 |
| |) | |
| JENNY LOUISE CUDD, |) | |
| |) | |
| Defendant. |) | |

MOTION TO TRAVEL

Defendant, Jenny Cudd, through counsel, asks this court to approve the following request for travel outside the country. In support thereof, she states as follows:

1. Ms. Cudd is currently charged with two misdemeanor offenses and is on pretrial release.
2. Ms. Cudd has no criminal history and is a United States citizen.
3. Ms. Cudd is a small business owner in Midland, Texas and an established member of her community.
4. Prior to the alleged offense at issue, Ms. Cudd planned and prepaid for a weekend retreat with her employees for the dates of February 18 through February 21, 2021, in Riviera Maya, Mexico. This is a work-related bonding retreat for employees and their spouses.
5. Ms. Cudd has appeared at her scheduled court appearance, remains in constant contact with her attorney, and has remained in contact with pretrial probation, as ordered.

6. Ms. Cudd's Pretrial Services Officer, Christine Schuck, has been advised of this request and has no objection to Defendant's travel request, stating she defers to the court.
7. Counsel for the government, David Kent, has been advised of this request and has advised that "the government takes no position on Ms. Cudd's request."

WHEREFORE Ms. Cudd respectfully requests that her travel request be granted, that she be permitted to travel to Mexico on February 18, 2021, and to return to the United States on February 21, 2021.

Respectfully submitted,

/s/

Farheena Siddiqui, DC Bar #888325080
Local Counsel for Defendant
Law Office Samuel C. Moore, PLLC
526 King St., Suite 506
Alexandria, VA 22314
Email: fsiddiqui@scmoorelaw.com
Phone: 703-535-7809

/s/

Marina Medvin, DC Bar #995966
Pro Has Vice Counsel for Defendant
MEDVIN LAW PLC
916 Prince Street, Ste. 109
Alexandria, Virginia 22314
Tel: 888.886.4127
Email: contact@medvinlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on February 1, 2021, I will electronically file the foregoing pleading with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to counsel for the United States, David Kent (USADC) at david.kent@usdoj.gov.

/s/

Farheena Siddiqui, DC Bar #888325080