

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 1:19-cr-20693-UU

UNITED STATES OF AMERICA

Plaintiff,

v.

PETER SOTIS and
EMILIE VOISSEM,

Defendants.

**DEFENDANT PETER SOTIS' UNOPPOSED
MOTION FOR LEAVE TO TRAVEL ABROAD**

COMES NOW, the Defendant PETER SOTIS, by and through the undersigned attorney, and hereby submits this Unopposed Motion for Leave to Travel Abroad, and in support thereof states as follows:

1. On October 24, 2019, Defendant Sotis was charged by Indictment of Conspiracy to Export Items in Violation of the IEEPA, in violation of 18 U.S.C. § 371, Export and Attempted Export of Goods in Violation of IEEPA, in violation of 50 U.S.C §§ 1705(a) & (c), and Smuggling of Goods, in violation of 18 U.S.C. § 554(a).

2. On October 30, 2019, Defendant Sotis was released after posting a \$250,000 Personal Surety Bond (DE 9) and has remained on bond, fully compliant with all terms and conditions thereto.

3. Jury trial has been set to begin on October 12, 2021 (DE 66).

4. Defendant Sotis owns a condominium located at Retorno Principe, condominium quetzal G-H3, 77780, Quintana Roo Mexico, Mexico, that he needs to sell in order to be able to pay his legal fees for his defense in the instant matter.

5. To make the condominium presentable to market for sale, Defendant Sotis must first oversee various long overdue repairs.

6. Defendant Sotis is requesting leave of the Court to be allowed to travel by air to Quintana Roo Mexico, which is located approximately one hour south of Cancun, Mexico, departing from Miami, Florida on July 1, 2021, and returning to Miami, Florida on July 6, 2021.

7. To be able to travel abroad, Defendant Sotis would first need to have his passport returned.

8. Concurrent with the filing of the instant motion, Defendant Sotis will file his Unopposed Motion for Temporary Return of Passport to effectuate his travel.

9. Defendant Sotis has strong ties to South Florida and presents no risk of absconding should the Court grant the forgoing motion.

10. Defendant Sotis will remain reachable by phone, and in constant contact with his probation officer throughout the entire period of July 1, 2021 through July 6, 2021, should the Court grant the foregoing motion.

11. AUSA Michael Thakur has represented to the undersigned that he does not oppose the relief sought in either the instant Motion for Leave to Permit Travel, or the concurrently filed Motion for Temporary Return of Passport.

WHEREFORE, for the reasons set forth herein, Defendant Sotis respectfully requests leave of the Court to travel by air from Miami, Florida on July 1, 2021, to Cancun, Mexico, and returning on July 6, 2021, to Miami Florida, and for all other and further relief the Court deems just and proper under the circumstances.

Dated: June 16, 2021

Respectfully submitted,

BRUCE L. UDOLF, P.A.

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By: /s/ Bruce L. Udolf

Florida Bar No. 0899933

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing was filed electronically using the Court's CM/ECF system on this 16th day of June, 2021 and was served electronically to all counsel of record.

By: Bruce Udolf