

1 Lee Stein (#12368)
2 lee@mscclaw.com
3 MITCHELL | STEIN | CAREY | CHAPMAN, PC
4 One Renaissance Square
5 2 North Central Avenue, Suite 1450
6 Phoenix, AZ 85004
7 Telephone: (602) 358-0292
8 Facsimile: (602) 358-0291
9 Attorneys for Defendant

10 UNITED STATES DISTRICT COURT

11 DISTRICT OF ARIZONA

12	United States of America,)	CR-17-0585-02-PHX-JJT
13)	
14	Plaintiff,)	MOTION FOR PERMISSION TO
15)	TRAVEL AND FOR MODIFICATION
16	v.)	OF CONDITIONS OF
17)	RELEASE
18	Peter Nathan Steinmetz, et al.,)	
19)	
20	Defendant.)	
21)	

22 Defendant Peter Steinmetz, though undersigned counsel, respectfully requests
23 permission from this Court authorizing his travel to Baltimore from October 19, 2017 to
24 October 20, 2017, and to New Hampshire from October 20, 2017 to October 23, 2017.
25 The purpose of this trip is for business relating to the Nakamoto Brain Research Institute.

26 Defendant also respectfully requests that his conditions of release be modified, by
27 deletion of his curfew [Dkt. 34] but retaining active GPS monitoring of defendant.

28 Undersigned counsel has spoken with Gilbert Lara of U.S. Pretrial Services, and
contacted AUSA Matthew Binford regarding this request for permission to travel and for
modification of his conditions of release. Counsel can state that Mr. Lara and Mr. Binford
do not oppose these two requests. The specific details of Dr. Steinmetz's requested
travel, including his flight itinerary and where he will be staying in Baltimore and New



1 Hampshire, have been provided to both Mr. Lara and Mr. Binford (Itineraries attached as
2 Exhibits 1-3).

3 It is not expected that excludable delay under Title 18 U.S.C. § 3161(h)(7)(B)(i)
4 and (iv) may occur as a result of this motion or from an order based thereon.

5 RESPECTFULLY SUBMITTED on October 12, 2017.

6 MITCHELL | STEIN | CAREY | CHAPMAN, PC

7 By: /s/ Lee Stein

8 Lee Stein

9 Attorneys for Defendant

10 I certify that on October 12, 2017, I electronically transmitted a PDF version of
11 this document to the Clerk of Court, using the CM/ECF System, for filing and for
12 transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

12 Clerk's Office
13 United States District Court
14 Sandra Day O'Connor Courthouse
15 401 W. Washington
16 Phoenix, Arizona 85003

16 Matthew Binford
17 Assistant U.S. Attorney
18 Two Renaissance Square
19 40 North Central Avenue, Suite 1200
20 Phoenix, AZ 85004
21 Attorneys for Plaintiff

21 COPY mailed on August 7, 2017, to:

22 Gilbert R. Lara
23 U.S. Pretrial Services
24 401 W. Washington, SPC 260
25 Phoenix, AZ 85003

26 /s/ Stephanie King