UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
v.)	No. 20 CR 812
)	
MICHAEL McCLAIN, et al.)	Honorable Manish S. Shah
	j	

DEFENDANT ANNE PRAMAGGIORE'S UNOPPOSED MOTION FOR PERMISSION TO TRAVEL

ANNE PRAMAGGIORE, through counsel, respectfully requests that this Honorable Court allow Ms. Pramaggiore to travel outside the Northern District of Illinois for purposes of visiting relatives in the Piedmont area of Italy from October 25, 2024 to November 5, 2024.

In support of this Motion, Ms. Pramaggiore states the following:

- 1. As a condition of her release on bond, Ms. Pramaggiore surrendered her passport to the United States Pretrial Services. Ms. Pramaggiore has complied with all the conditions of her release on bond.
- 2. Ms. Pramaggiore and her family would like to travel to the Piedmont area of Italy from October 25, 2024 to November 5, 2024 to visit relatives.
- 3. To do so, Ms. Pramaggiore will need her passport, which is now expired, from the United States Pretrial Services.
- 4. Counsel for Ms. Pramaggiore has communicated with Assistant United States Attorney Amarjeet Bhachu who does not object to this Motion.

WHEREFORE, Ms. Pramaggiore respectfully requests that she be permitted to travel to the Piedmont area of Italy from October 25, 2024 to November 5, 2024. She further requests that she receive her passport from the United States Pretrial Services.

DATED: September 18, 2024

Respectfully submitted,

/s/ Scott R. Lassar

Scott R. Lassar Daniel C. Craig Jennifer M. Wheeler Emily R. Woodring Joan E. Jacobson SIDLEY AUSTIN LLP One South Dearborn Chicago, IL 60603

Telephone: (312) 853-7000 Facsimile: (312) 853-7036

slassar@sidley.com dcraig@sidley.com jwheeler@sidley.com ewoodring@sidley.com joan.jacobson@sidley.com

Attorneys for Defendant Anne Pramaggiore