

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

ELKAN ABRAMOWITZ  
RICHARD F. ALBERT  
ROBERT J. ANELLO\*  
BENJAMIN S. FISCHER  
CATHERINE M. FOTI  
CHRISTOPHER B. HARWOOD  
LAWRENCE IASON  
BRIAN A. JACOBS  
TELEMACHUS P. KASULIS  
JODI MISHNER PEIKIN  
ROBERT M. RADICK\*  
JONATHAN S. SACK\*\*  
EDWARD M. SPIRO  
JEREMY H. TEMKIN  
RICHARD D. WEINBERG

565 FIFTH AVENUE  
NEW YORK, NEW YORK 10017  
(212) 856-9600  
FAX: (212) 856-9494

www.maglaw.com

WRITER'S CONTACT INFORMATION

tkasulis@maglaw.com  
(212) 880-9555

SENIOR COUNSEL  
PAUL R. GRAND  
COUNSEL  
JASMINE JUTEAU  
CURTIS B. LEITNER  
JACOB W. MERMELSTEIN  
BRENT M. TUNIS  
ROBERT G. MORVILLO  
1938-2011  
MICHAEL C. SILBERBERG  
1940-2002  
JOHN J. TIGUE, JR.  
1939-2009

\*ALSO ADMITTED IN WASHINGTON, D.C.

\*\*ALSO ADMITTED IN CONNECTICUT

August 19, 2020

**By ECF**

The Hon. Nicholas G. Garaufis  
United States District Judge  
United States Courthouse  
225 Cadman Plaza East, Room 1426 S  
Brooklyn, New York 11201

Re: United States v. Jason Kurland,  
20 Cr. 306 (NGG)

Dear Judge Garaufis:

We represent defendant Jason Kurland the above-captioned matter. We respectfully request that this Court permit Mr. Kurland to travel to Somerset, New Jersey from August 21, 2020 through August 23, 2020 to bring his children to a previously-scheduled soccer tournament.

Mr. Kurland was arrested yesterday and released on bond after arraignment before Magistrate Judge Lois Bloom. Among other things, the conditions of Mr. Kurland's pretrial release restrict his travel to the Southern and Eastern Districts of New York. Mr. Kurland requests permission to drive with his wife and three children to Somerset, New Jersey, on the afternoon of August 21, and to stay until the afternoon of August 23. All three of his children will participate in the soccer tournament over the weekend. Mr. Kurland and his family will stay at a local hotel on the evenings of August 21 and August 22.

Given that Mr. Kurland was arrested yesterday, Pretrial Services has indicated that they defer to the Government's view of this application. The Government has advised us that they have no objection to this request.

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Accordingly, we respectfully request that the Court approve Mr. Kurland's travel to the District of New Jersey from August 21 through August 23 for the reasons set forth above.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Telemachus P. Kasulis  
Telemachus P. Kasulis  
A. Dennis Dillon

Counsel for Jason Kurland

cc: Assistant United States Attorney Andrey Spektor (by ECF and email)  
Assistant United States Attorney Lindsay K. Gerdes (by ECF and email)  
Marnie Gerardino, U.S. Pretrial Services Office, Eastern District of New York (by email)