EXHIBIT 1

Case 1:10-cr-10359-NMG Document 15-1 Filed 09/12/11 Page 2 of 3 Case 1:10-cr-10359-NMG Document 13 Filed 06/24/11 Page 1 of 2

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

)
) No. 10-CR-10359-NMG
))
)

DEFENDANT'S UNOPPOSED MOTION TO TRAVEL TO EUROPE FROM JULY 11, 2011 THROUGH SEPTEMBER 2, 2011

Now comes the defendant and respectfully requests he be permitted to travel to Europe from July 11, 2011 through September 2, 2011.

In support of this motion defendant states:

- 1. On November 23, 2010, defendant pleaded guilty before this Honorable Court to a one count Information charging him with willfully failing to file an FBAR for 2007.
- 2. At that time, defendant surrendered his passports and turned over to the Clerk's Office a deed to his condominium residence as security if he fails to return to the United States from European Travel.
- 3. Under the terms of his pre-trial release, defendant is presently permitted to travel abroad for up to 24 days.
- 4. Defendant is planning to travel to Austria this summer to spend time with his 83 year old mother and give his siblings a break from their responsibilities to care for their mother.
- 5. Defendant respectfully requests that for this trip he be permitted to travel abroad for up to 52 days to avoid coming back after 24 days and then going back to Austria five days later. Initially defendant booked two separate such trips which resulted in his returning on September 2. Such a schedule is not only expensive, but affects his sleep, digestion and health issues involving his back and neck. Detailed records of his back and neck conditions have been submitted to Martha Victoria of Probation.
- 6. Bob Riley of Pretrial Services and Assistant U.S. Attorney Andrew Lelling do not object to the allowance of this motion.

Case 1:10-cr-10359-NMG Document 15-1 Filed 09/12/11 Page 3 of 3
Case 1:10-cr-10359-NMG Document 13 Filed 06/24/11 Page 2 of 2

7. Mr. Lelling has filed a motion to continue defendant's sentencing from August 11, 2011, to October, 2011.

WHEREFORE, defendant respectfully requests the above motion be allowed.

Respectful Submitted,

Peter A. Schober

By his attorney,

/s/Terry Philip Segal

Terry Philip Segal (BBO No. 450760) DUANE MORRIS LLP 470 Atlantic Avenue, Suite 500 Boston, MA 02210

Tel: (857) 488-4200

Fax: (857) 488-4201

Email: tpsegal@duanemorris.com

Date: June 24, 2011

CERTIFICATE OF SERVICE

On this 24th day of June, 2011, I, Terry Philip Segal, hereby certify that I served a true and accurate copy of the above document, via ECF to the following:

Andrew E. Lelling Assistant U.S. Attorney U.S. Attorney's Office John Joseph Moakley U.S. Courthouse 1 Courthouse Way Boston, MA 02210

/s/ Terry Philip Segal
Terry Philip Segal