

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO.: 19-20273-CR-MORENO**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**Vs.**

**BILL K. KAPRI a/k/a DIEUSON  
OCTAVE a/k/a “KODAK BLACK”,**

**Defendant.**

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**MOTION FOR PERMISSION TO TRAVEL**

COMES NOW, the Defendant, BILL KAPRI a/k/a Dieuson Octave a/k/a “Kodak Black” (hereafter “Defendant”), by and through his undersigned counsel and pursuant to the Federal Rules of Criminal Procedure, hereby files Motion for Permission to Travel and in support and furtherance thereof would state the following:

1. On or around January 19th, 2021, the Defendant was issued a Presidential Commutation from President Donald J. Trump and released from custody on two (2) counts of 18 U.S. Code § 922 (a)(6) after serving approximately 21 months in a maximum-security prison.
2. The Defendant is still on probation for a period of 36 months from the date of release.
3. Since his release, he has continued the charity work he has done prior to being incarcerated and during incarceration. If the court remembers, he was scheduled to perform at a concert and donate the salary to a scholarship set up in the name of Meadow Pollack the day he was arrested. Since being released 3 weeks ago, he has set up and is funding the scholarship with

monies he has made since his release. The \$100,000.00 dollar scholarship is being set up at Nova Southeastern Law School, (the law school Meadow Pollack's brother attends) for the benefit of students interested in prison and justice reform. He is also funding, with monies earned since his release, the college education of 3 children of 2 fallen FBI agents. The FBI agents were tragically killed, while in the process of serving a warrant on a known sex offender.

4. In order to continue to do the charity he is committed to do; we are asking for the courts permission to be able to travel the United States for work purposes only. His future charitable work is to include, funding a school and alternative power sources in Haiti, future Scholarship opportunities for High School students in low-income neighborhoods and small business grants for prior convicted felons, so that they can start their own business. All these charitable donations will be funded with future business opportunities, that will require travel.

5. Probation has permitted him to travel once since the time of his release, to the Middle District of Florida, without incident. During the travel, without disclosing his security protocols, his security have prior Federal protection experience, and he was always monitored for his own safety, by individuals that were approved by probation. He has also been compliant with all requests from probation, and with the prior court Order regarding special conditions. He has also gone over and above the requests of the court, and is currently enrolling in higher education classes.

6. Probation will be made them aware of the travel and will also provide the full itinerary of the stay and movement, if permitted to travel. This travel is for business that Mr. Kapri is being compensated for and not for purposes of personal entertainment.

7. Defendant has already drug tested since his release and is willing to be drug tested upon leaving and returning each trip.

8. Undersigned counsel contacted AUSA Bruce Brown via email about the request and is awaiting a response. Probation does not have an objection in regarding the motion to travel.

**CERTIFICATE OF SERVICE**

THE UNDERSIGNED HEREBY CERTIFIES that the foregoing document was electronically filed with the Clerk of the Court using CM/ECF and that a true and correct copy of this document has been served on February 16, 2021 either electronically in compliance with the Notice of Electronic Filing generated by CM/ECF or in some alternative manner for those parties who may not be permitted to receive to receive electronic filings via CM/ECF.

**COHEN & MCMULLEN, P.A.**

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