

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

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UNITED STATES OF AMERICA,

22-mj-00203

- against -

JON LIZAK,

**MOTION TO
TEMPORARILY
MODIFY CONDITIONS
OF RELEASE**

Defendant.
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KEVIN J. KEATING, an attorney duly admitted to the practice of law affirms as follows:

1. As Your Honor is aware I represent Jon Lizak in the captioned matter.
2. Lizak is 23 years old and without any criminal history. He was originally arraigned in this matter on September 22, 2022 on a misdemeanor charge and released on an unsecured bond with customary travel restrictions. To date, Lizak has been fully compliant with the conditions of his release.
3. I write to respectfully request a temporary modification of Lizak's conditions of release so as to enable him to take a trip with his fiancé's family (Lizak is scheduled to get married next year). If permitted, Lizak would leave his New York residence on December 10th to fly to Colorado (where his fiancé lives) and then fly from Colorado to Hawaii on December 12th. Lizak would return to New York from Hawaii on December 22nd.
4. I have conferred with AUSA Joseph Huynh, who advises that the Government takes no position on this request, and defers to the Court. Pretrial Services Officer Marnie Gerardino offers her consent to this application.

WHEREFORE, it is respectfully requested that the Court grant the requested relief.

Dated: Garden City, New York
November 24, 2022

Respectfully submitted,

LAW OFFICE OF KEVIN J. KEATING, P.C.

/s/ Kevin J. Keating

By: Kevin J. Keating, Esq.
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To: AUSA Joseph Huynh