

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

ROBERT SANFORD

Defendant.

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Case No: 1:21-CR-86-PLF

MOTION TO MODIFY CONDITONS OF RELEASE

COMES NOW the defendant, Robert Sanford, by and through undersigned counsel, and requests that this Court modify the conditions of release to allow him to travel within a twenty-five-mile radius of his residence.

1. This matter is currently scheduled for a status conference on June 30, 2021, at 10:00 am.
2. On March 3, 2021, this Court entered an order setting conditions of release. Condition seven required Mr. Sanford to submit to courtesy supervision by the Eastern District of Pennsylvania and to obtain approval from the Court for all travel outside that district.
3. Since his release, Mr. Sanford has followed all his conditions of release.
4. Mr. Sanford is retired and prior to his incarceration and release he was responsible for transporting his minor children to their activities which included sporting events in New Jersey and Delaware.
5. Mr. Sanford's residence in Chester County, Pennsylvania, is located less than five miles from both the Delaware and New Jersey state borders. (Exhibit 1)
6. Mr. Sanford would like permission to transport his children to activities outside the Eastern District of Pennsylvania and within a twenty-five-mile radius of his residence.
7. The government does not oppose this request.

Wherefore, for the foregoing reasons, Mr. Sanford respectfully requests that this Court modify the conditions of release and permit him to transport his children to activities outside the Eastern District of Pennsylvania and within a twenty-five-mile radius of his residence.

Respectfully submitted,
Robert Sanford

By: /s/ Andrew M. Stewart.
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CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of April, 2021, I electronically filed the foregoing motion with the clerk of the court using the CM/ECF system, which will send an electronic copy to the following:

Janani Iyengar
Assistant United States Attorney
U.S. Attorney's Office, Eastern District of Virginia
555 4th Street, NW
Washington, D.C. 20001

By: /s/ Andrew M. Stewart .
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ORDER

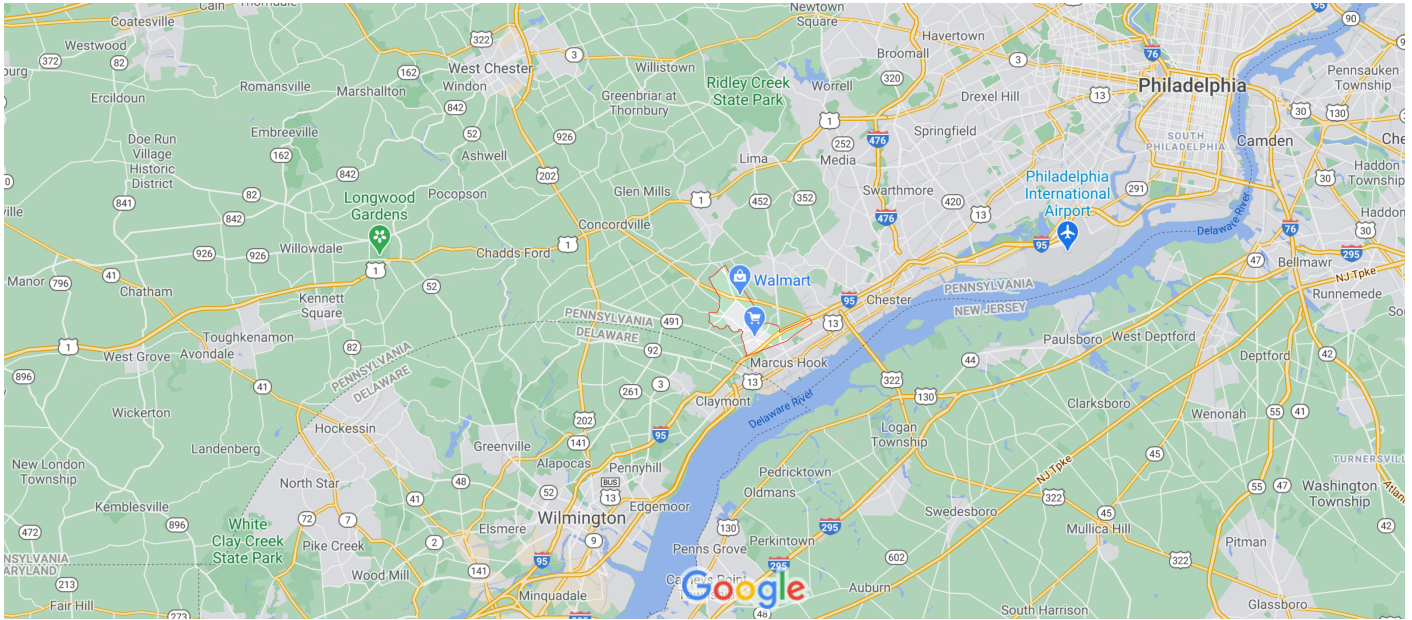
Upon consideration of Defendant Robert Sanford’s unopposed motion to modify conditions of release, and for good cause shown, it is **HEREBY ORDERED** that the motion is **GRANTED**; and it is further

ORDERED that Mr. Sanford shall be permitted to transport his children to activities outside the Eastern District of Pennsylvania and within a twenty-five-mile radius of his residence.

ENTERED this ____ day of April, 2021.

The Honorable Paul L. Friedman
United States District Judge

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