

**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**

**SECOND UNOPPOSED 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 and impose a curfew to be set by the pretrial officer in lieu of other travel restrictions currently in place.

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. On April 12, 2021, this Court granted Mr. Sanford's unopposed motion to modify the conditions of release to allow Mr. Sanford to transport his children to activities outside the Eastern District of Pennsylvania and within a twenty-five-mile radius of his residence.
4. Undersigned counsel consulted with the pretrial officer supervising Mr. Sanford in the Eastern District of Pennsylvania to determine what modified conditions would be appropriate to allow Mr. Sanford to assist with required travel for the family.
5. The pretrial officer supervising Mr. Sanford suggested that a curfew would be appropriate.
6. 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 impose a curfew to be set by his pretrial officer in the Eastern District of Pennsylvania in lieu of other travel restrictions currently in place.

Respectfully submitted,  
Robert Sanford

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

I hereby certify that on the 4<sup>th</sup> day of June, 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 4<sup>th</sup> Street, NW  
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By: /s/ Andrew M. Stewart .  
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<b>ROBERT SANFORD</b>	:	
	:	
<b>Defendant.</b>	:	

**ORDER**

Upon consideration of Defendant Robert Sanford’s second 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 adhere to a curfew to be set by his pretrial officer in the Eastern District of Pennsylvania in lieu of other travel restrictions currently in place.

ENTERED this \_\_\_\_ day of June, 2021.

\_\_\_\_\_  
The Honorable Paul L. Friedman  
United States District Judge