

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

**UNITED STATES OF AMERICA,** )  
 )  
 v. ) **No. 21-376 (RDM)**  
 )  
**RYAN SETH SULESKI,** )  
 )  
 **Defendant.** )  
\_\_\_\_\_ )

**UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE**

Defendant, Ryan Suleski, through counsel, respectfully requests that the Court modify the conditions of release currently in place, requiring Mr. Suleski to notify Pre-Trial Services in advance of all work travel outside of the Eastern District of Virginia. Below are the reasons in support:

- (1) Mr. Suleski was charged by criminal complaint on March 5, 2021 with Obstruction of an Official Proceeding and Aiding and Abetting in violation of 18 U.S.C. §1512(c)(2), 18 U.S.C. §1752(a)(1)(2), 40 U.S.C. §5104(e)(2)(E), and one count of 18 U.S.C. §641. *See* ECF Dkt. No. 1.
- (2) Mr. Suleski was arrested on March 10, 2021 in Chesapeake, Virginia. *See* ECF Dkt. No. 5.
- (3) The court set conditions of release on March 16, 2021, which included a condition that he notify Pre-trial Services of any travel outside of the Eastern District of Virginia. *See* ECF Dkt. No. 6.
- (4) Mr. Suleski was indicted on May 26, 2021 for the same charges outlined in the criminal complaint except for 18 U.S.C. §641. *See* ECF Dkt. No. 8. He appeared

for his arraignment on June 1, 2021 and a status conference was set for September 1, 2021.

- (5) Since March 10, 2021, Mr. Suleski has been in compliance with all conditions of release and has appeared for all of his court proceedings.
- (6) Mr. Suleski's place of employment requires him to pick up deliveries in different states. Based on this, the magistrate court allowed him to travel for work as long as he notified his pre-trial officer. Recently, Mr. Suleski has encountered a timing issue where his employer notifies him of a required out of state delivery moments before he must leave. Based on this, it is has been difficult for him to notify his pre-trial officer prior to traveling out of state. Mr. Suleski has been abiding by this condition, however it has caused delays with his work. Mr. Suleski respectfully requests that the Court modify his conditions of release by modifying the travel restriction requiring him to notify pre-trial in advance of out of state work travel.
- (7) Undersigned counsel discussed this request with his pre-trial officer, who has no opposition to this request. The government also has no opposition as long as Mr. Suleski still keeps pre-trial apprised of his whereabouts.

### **Conclusion**

For these reasons, Mr. Suleski respectfully requests that the Court grant this motion to modify conditions of release by modifying his travel restriction requiring him to notify Pre-trial Services in advance of out of state work travel.

Respectfully submitted,

A. J. KRAMER  
FEDERAL PUBLIC DEFENDER

/s/

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