

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

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>v.</b>	)	
	)	<b>CRIM NO. 21-CR-411-APM</b>
<b>SANDRA PARKER,</b>	)	<b>Judge: Mehta</b>
	)	
<b>Defendant.</b>	)	

**UNOPPOSED MOTION TO MODIFY RELEASE CONDITIONS**

COMES NOW Sandra Parker, by and through counsel, and moves to modify her release conditions to permit her to travel to the Eastern District of Kentucky.

As reasons therefor, defendant states as follows:

1. Sandra Parker is currently under release conditions which require her to reside and remain in the Southern District of Ohio.

2. Ms. Parker has a daughter who has a school project in which her daughter is required to travel to the Eastern District of Kentucky. The project is due Tuesday, December 6, 2022

3. Ms. Parker would like to assist her daughter in this project by accompanying and driving her to the Eastern District of Kentucky. This would occur for a few hours sometime between December 3 and December 5, 2022. Ms. Parker and her daughter would then return to the Southern District of Ohio.

4. Upon information and belief, Ms. Parker is and has been in compliance with all her release conditions.

5. Undersigned counsel has communicated with AUSA Kathryn Rakoczy, who has indicated that the government does not oppose the motion.

WHEREFORE, for the reasons above, Defendant Sandra Parker requests an order permitting her to travel to the Eastern District of Kentucky sometime between December 3<sup>rd</sup> to December 5<sup>th</sup>, 2022.

Respectfully submitted,

SANDRA PARKER  
By Counsel

/s/ John L. Machado  
John L. Machado, Esq.  
Bar No. 449961  
Counsel for Sandra Parker  
503 D Street, N.W., Suite 310  
Washington, DC 20001  
Telephone: (703) 989-0840  
E-mail: [johnlmachado@gmail.com](mailto:johnlmachado@gmail.com)

**Certificate of Service**

I hereby certify that a true copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system this 30th day of November, 2022, which will send a notification of such filing (NEF) to the following to all counsel of record.

/s/John L. Machado  
John L. Machado, Esq.  
Bar Number 449961  
Attorney for Sandra Parker  
Law Office of John Machado  
503 D Street NW, Suite 310  
Washington, D.C. 20001  
Telephone (703)989-0840  
Email: johnlmachado@gmail.com