

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,)
)
v.)
)
ERIC GAVELEK MUNCHEL,)
)
Defendant.)
_____)

Case No. 21-CR-00118-RCL-1

UNOPPOSED MOTION FOR MODIFICATION OF BOND CONDITIONS

COMES NOW the Defendant, Eric Munchel (Mr. Munchel) by and through undersigned counsel, and respectfully tenders his unopposed motion for modification of bond conditions to permit his mother and co-defendant, Lisa Eisenhart, to attend his upcoming wedding and in support thereof states as follows:

1. On January 10, 2021, Mr. Munchel was arrested in the State of Tennessee on a complaint alleging charges arising out of events on January 6, 2021. (*See* ECF at [1](#)). The Indictment and subsequent superseding indictments against Mr. Munchel names one Lisa Eisenhart as a co-defendant. Mr. Munchel was granted release on his own recognizance on March 29, 2021, and has remained so since.
2. Among the various conditions of release imposed upon Mr. Munchel and his co-defendant are restrictions on communication and contact between them. Such conditions have been modified by this Court on several occasions to facilitate the common and natural familial bond between the parties (*See* ECF at [74](#), [124](#), and [138](#)).
3. Mr. Munchel will soon be wed and is desirous that his mother should be present and be permitted to share in the celebration.

4. As the conditions of release currently stand, Mr. Munchel's mother is prohibited from attending the wedding.
5. Both pre-trial release and counsel for the government have been consulted on their position to this bond modification and both have indicated they have no objection, provided both parties continue to adhere to all other conditions currently imposed.
6. At this time, the exact dates and location within the State of Tennessee of the wedding are to be determined, largely dependent on this Court's decision on this motion, therefore Mr. Munchel and his co-defendant would pray that this Court find it satisfactory for the wedding itinerary, once formulated, to be submitted to pre-trial release for the implementation of the Order of this Court on the matter.

WHEREFORE Defendant respectfully prays this Court make and enter its Order granting relief as prayed, and for such other and further relief as this Court shall deem just and proper on the premise.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gall", is positioned above the printed name and contact information of the attorney.

Joseph W. Allen, MO BAR #57669
1015 W. State Hwy. 248 Ste. I
Branson, MO 65616
Telephone: 417/334-6818
Facsimile: 417/612-7081
joe@mybransonattorney.com
Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of, December 2022, I filed the foregoing Unopposed Motion to Modify Bond Conditions and a proposed Order by the Court's CM/ECF system. All case registered parties will be served by CM/ECF.

A handwritten signature in black ink, appearing to read "J. Allen", is positioned above a horizontal line.

Joseph W. Allen