

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

UNITED STATES OF AMERICA	)	Docket No. 1:21-cr-00386
	)	
	)	
v.	)	ELECTRONICALLY FILED
	)	
PAULINE BAUER,	)	The Honorable Trevor N. McFadden
	)	
Defendant.	)	

**DEFENDANT’S MOTION TO MODIFY CONDITION OF RELEASE AND  
PERMIT AN OVERNIGHT VISIT**

And now, to-wit, comes the Defendant, Pauline Bauer (hereinafter “Ms. Bauer”), by and through her counsel, Komron Jon Maknoon, and respectfully submits the within Defendant’s Motion to Modify Condition of Release and Permit an Overnight Visit. In support thereof, she avers as follows:

1. On June 4, 2021, Ms. Bauer was indicted on alleged violations of 18 U.S.C. §§ 1512(c)(2) and 2, 18 U.S.C. § 1752(a)(1), 18 U.S.C. § 1752(a)(2), 40 U.S.C. § 5104(e)(2)(D), and 40 U.S.C. § 5104(e)(2)(G) (*See* ECF Doc. No. 11).
2. A superseding indictment was issued on March 16, 2022, with the same alleged violations (*See* ECF Doc. No. 116).
3. On September 17, 2021, Ms. Bauer was remanded to the custody of the U.S. Marshals for violations of pretrial conditions.
4. On May 20, 2022, undersigned counsel respectfully entered his appearance on behalf of Ms. Bauer (*See* ECF Doc. No. 129).
5. On June 27, 2022, Ms. Bauer filed a Motion for Reconsideration of Detention Order Pursuant to 18 U.S.C. § 3142(f) (*See* ECF Doc. No. 137).

6. On or about July 25, 2022, Ms. Bauer filed a Sealed Emergency Supplement to her Motion for Reconsideration of Detention Order Pursuant to 18 U.S.C. § 3142(f).

7. On or about September 20, 2022, Status Conference as to Ms. Bauer and a Motion Hearing on Ms. Bauer's Motion for Reconsideration of Detention Order was held.

8. On or about September 20, 2022, Ms. Bauer's Motion for Reconsideration of Detention Order was granted, and Ms. Bauer was placed on conditions of release (*See* ECF Doc. No. 163).

9. Pursuant to Ms. Bauer's conditions of release (7t), Ms. Bauer must have advanced approval from the United States Probation Officers to visit her father who resides in Gibsonia, Pennsylvania (*See* ECF Doc. No. 163).

10. Ms. Bauer's father lives approximately 2.5 hours from her residence.

11. Currently, Pretrial Services allows for Ms. Bauer to visit her father during the day; however, she must return to her residence by 11:00pm.<sup>1</sup>

12. Recently, Ms. Bauer's father was placed on hospice care due to his quickly deteriorating health.

13. At this time, Ms. Bauer would like to spend additional time with her father as well as relieve her sister from the stress/fatigue from the constant care of her father from Monday October 31, 2022 until Tuesday November 1, 2022 and return by curfew.

14. Pretrial Services have approved this visit but is unable to approve the overnight visit.

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<sup>1</sup> Ms. Bauer and United States Pretrial Services have assigned Mondays for daytime visitation with her father.

15. On October 28, 2022, Assistant United States Attorney James Peterson stated that the government has no objection to this overnight visit provided that United States Pretrial Service consents.

16. Currently, undersigned counsel is awaiting the position United States Pretrial Services.

WHEREFORE, Ms. Bauer respectfully requests that this Honorable Court consider Defendant's Motion to Modify Condition of Release and Permit an Overnight Visit and grant permission to allow Ms. Bauer stay overnight at her father's house from Monday October 31, 2022 until Tuesday November 1, 2022 and return by curfew.

Respectfully submitted,

s/ Komron Jon Maknoon  
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