

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

NOAH BACON,

Defendant.

Case No.: 1:21-cr-00488 CRC-1

**MOTION TO MODIFY CONDITIONS  
OF RELEASE TO PERMIT TRAVEL**

COMES NOW, Noah Bacon, through counsel, Joseph R. Conte, to respectfully request this honorable court to amend his conditions of release to permit him to travel to Hot Springs, Arkansas from March 2, 22022 to April 7, 2022. As grounds for this motion counsel would state:

- 1. The defendant is on release and prohibited from travel outside his home judicial district absent leave of the court.
- 2. The defendant wishes to travel to Hot Springs, Arkansas from March 29, 2022, to April 7, 2022, to visit and help a friend.
- 3. Undersigned has spoken to government counsel who has advised counsel that the government takes no position with respect to this motion.

WHEREFORE counsel respectfully requests that this motion be granted.

Dated: March 12, 2022

Respectfully submitted,

<i>United States v. Noah Bacon</i> Case #1:21-cr-00488 CRC-1 Motion to Modify Conditions of Release to Permit Travel Page No. 1 BOND MODIFY 22/03/12 06:21:12		Joseph R. Conte 400 Seventh St., N.W., #206 Washington, D.C. 20004 Phone: 202.638.4100 Email: dgunlaw@gmail.com
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