

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,)	
)	
v.)	No. 21-cr-540 (PLF)
Timothy Allen Hart)	
)	
Defendant.)	
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MOTION TO MODIFY CONDITIONS OF RELEASE TO ALLOW TRAVEL

COMES NOW, the defendant, Timothy Allen Hart, by and through his counsel, and herein respectfully moves the Court to reinstate its prior order to modify the conditions of his pre-trial release to allow him to travel on a pre-paid cruise leaving on different dates, from Fort Lauderdale, FL on December 3, 2022 and returning on December 10, 2022. Counsel submits the following in support of this motion.

1. On April 1, 2022, the Court granted the same request for Mr. Hart to travel on a cruise earlier this year. *See* ECF No. 26.
2. Unfortunately, Mr. Hart was unable to travel on that cruise as after his motion was granted, the cruise was sold out and Mr. Hart was unable to book the travel.
3. He has been given until December of 2022 to use the credit from the cruise he cancelled last year. Mr. Hart has found another cruise that leaves Fort Lauderdale, FL on December 3, 2022, and returns on December 10, 2022.
4. This cruise would travel to San Juan, Puerto Rico, the British Virgin Islands, and St. Kitts/Nevis, stopping at these locations just for the day and requiring passengers to re-board the cruise ship at a designated time.

5. Mr. Hart has continued to be compliant with his pre-trial release conditions and does not pose a risk of flight. Furthermore, he has been present at each court proceeding in this manner and will continue to abide by his court ordered conditions.
6. Counsel has discussed this renewed request with government counsel, who notes that the government has previously opposed the request but defers to the Court given its prior ruling and does not proffer any additional facts or arguments.

WHEREFORE, Mr. Hart respectfully requests that the Court modify his conditions of release to permit him to travel outside of the continental United States only for the purpose of traveling on this cruise leaving on December 3, 2022 and returning on December 10, 2022.

Respectfully submitted,

A.J. KRAMER
FEDERAL PUBLIC DEFENDER

/s/

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