

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

UNITED STATES OF AMERICA,)	
)	
v.)	
)	CRIM NO. 21-CR-28
SANDRA PARKER,)	Judge: Mehta
)	
and)	
)	
BENNIE PARKER,)	
)	
Defendants.)	

MOTION TO MODIFY RELEASE CONDITIONS

COME NOW defendants, Sandra and Bennie Parker, through their respective counsel, and ask this Court to modify their release conditions to allow them to travel by automobile to Florida from August 5th, 2022, through August 14th, 2022. As reasons therefor, defendants state as follows:

1. Defendants Bennie and Sandra Parker, who are husband and wife, are pending trial in the present matter. They are both on personal recognizance and reside in Ohio. Their trial is currently scheduled for November 28, 2022, though it appears that that trial date may be delayed.

2. The Parkers would like to go on a family trip to Florida in the beginning of August, 2022. They, along with their daughter, plan to drive down from Ohio to

Florida on Friday, August 5, 2022, and return home on August 14, 2022.

3. Upon information and belief, the Parkers have not incurred any violations of release conditions, despite having been on supervision by the Pretrial Services Office in Ohio for over one year.

4. Counsel has spoken with AUSA Kathryn Rakoczy, who has indicated that the government formally opposes the motion but will not file a written response.

WHEREFORE, Sandra and Bennie Parker respectfully request that their release conditions be modified to allow them to travel to Florida from August 5th through August 14th, 2022, and for any other relief that this Court deems just and proper.

Respectfully submitted,

SANDRA PARKER

BENNIE PARKER

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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 26th day of May, 2022, which will send a notification of such filing to all counsel of record.

/s/John L. Machado

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