

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

UNITED STATES OF AMERICA)	
v.)	
LISA MARIE EISENHART)	Case No. 1:21-cr-118 (RCL)

DEFENDANT’S CONSENT MOTION FOR MODIFICATION OF BOND

NOW COMES Defendant Lisa Marie Eisenhart, by and through undersigned appointed counsel, and with the consent of the Government, files this request to modify her conditions of bond to allow her to travel together with her son to attend their upcoming Stipulated Bench Trial in Washington, DC. All other ongoing conditions of bond would remain in effect.

As the Court is aware, Ms. Eisenhart and her co-defendant are mother and son. Ms. Eisenhart resides in Georgia, while her son, co-defendant Eric Munchel, resides in Tennessee. The original bond conditions in this case placed certain limits on both defendants’ ability to be together or even speak with each other. Both defendants submit that they have fully complied with those conditions for years now; when needed, the parties have, on occasion, filed formal motions with this Court through counsel, seeking permission for the two to be or speak together on certain occasions, including recently to discuss the Government’s wired plea negotiations.

The current motion represents another such filing. The parties have recently agreed to submit to a Stipulated Bench Trial, which apparently will be held in Washington, DC on April 18, 2023. That will be the first in-person hearing held in Washington, DC (rather than on Zoom) since Defendants’ release on bond. Rather than apply to this Court for CJA travel expenses, Ms.

Eisenhart would prefer to travel with her son, which would thus have the added benefit of saving the Government the costs of her transportation to the upcoming Stipulated Bench Trial.

Both Defendants have agreed to that Stipulated Bench Trial, and to a series of related, stipulated facts. While this Court can of course choose to continue to restrict the Defendants' ability to talk about the merits of this case (as it has done in the past), any lingering concerns that might exist that these Defendants may engage in such discussions despite the Court's restrictions are significantly ameliorated here by the fact that both Defendants have now signed on to the Government's requested stipulated facts. The Government has been contacted about this motion, and, through AUSA Michael Gordon, the Government consents to this motion being granted.

WHEREFORE, Ms. Eisenhart's bond conditions (and if necessary, Mr. Munchel's as well) should be modified to allow these Defendants to travel together for the purpose of attending their upcoming Stipulated Bench Trial in Washington, DC.

Dated: March 30, 2023.

Respectfully submitted,

/s/ Gregory S. Smith
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing is automatically being served upon all counsel of record, via the Electronic Case Filing system.

This 30th day of March, 2023.

/s/ Gregory S. Smith
Gregory S. Smith