

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

**UNITED STATES OF AMERICA,** )  
 )  
 **v.** ) **No. 21-cr-540 (PLF)**  
 **Timothy Allen Hart** )  
 )  
 **Defendant.** )  
 \_\_\_\_\_ )

**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 modify the conditions of his pre-trial release to allow him to travel on a pre-paid cruise leaving from Fort Lauderdale, FL on April 9, 2022 and returning on April 16, 2022. Counsel submits the following in support of this motion.

1. On June 30, 2021, Mr. Hart was arrested in Huber Heights, OH on a criminal complaint alleging violations of 18 U.S.C. § 1752, 231(a)(3), 1512 (c)(2), and 40 U.S.C. §5104(e)(2)(D) and (G).
2. He was released on pre-trial release under standard conditions of release, which specify that all travel outside the continental United States must be approved by the court. *See* ECF No. 7.
3. Mr. Hart was indicted on August 25, 2021, for the same charges alleged in the criminal complaint, to which he entered a plea of not guilty on September 21, 2021. The government obtained a superseding indictment alleging the same charges but amending language on January 6, 2022. Mr. Hart also entered a plea of not guilty to the superseding indictment on February 1, 2022.



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