

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAVID ANTONIO TICAS,

Defendant.

Case No. 1:21-CR-00601-JDB

**EX PARTE APPLICATION FOR EARLY TERMINATION OF PROBATION**

Defendant David Antonio Ticas, by and through his attorney of record, Deputy Federal Public Defender Lisa LaBarre, hereby moves *ex parte* for early termination of his term of probation. This application is based upon the attached declaration of counsel.

Respectfully submitted,

CUAUHTEMOC ORTEGA  
Federal Public Defender

DATED: October 4, 2023

By */s/ Lisa LaBarre*

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LISA LABARRE  
Deputy Federal Public Defender  
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(E-Mail: Lisa\_Labarre@fd.org)

**DECLARATION OF LISA LABARRE**

I, Lisa LaBarre, declare:

1. I am an attorney with the Office of the Federal Public Defender for the Central District of California. I am licensed to practice law in the State of California and I am admitted to practice in this Court. I am counsel of record for David Antonio Ticas.

2. On July 18, 2022, this Court sentenced Mr. Ticas to fourteen days of imprisonment, followed by two years of supervised release. Dkt. 40. Mr. Ticas completed his fourteen day term of imprisonment on September 23, 2022, and thus his term of probation commenced on that date.

3. Per 18 U.S.C. § 3564(c), this Court may terminate a term of probation previously ordered at any time. Mr. Ticas has had no violations of his probation. Mr. Ticas is employed and lives with his family in the Northern District of Georgia.

4. Mr. Ticas's probation officer, United States Probation Officer Natasha A. Latimore, has no objection to this early termination request. AUSA Andrew Tessman agrees with and defers to the position of the United States Probation Office.

5. For the foregoing reasons, Mr. Ticas respectfully requests early termination of his term of probation.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 4, 2023, at Los Angeles, California.

*/s/ Lisa LaBarre*

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LISA LABARRE, DFPD