

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

UNITED STATES OF AMERICA :
 :
 : **Criminal No. 1:22-CR-00186 (TJK)**
 :
RALPH JOSEPH CELENTANO III :

**UNOPPOSED MOTION FOR MODIFICATION OF
CONDITIONS OF RELEASE**

Ralph Joseph Celentano III, respectfully requests this Honorable Court modify his release conditions by allowing him to travel to Easton, Connecticut for the day on December 4, 2022 to get a Christmas tree with his family.

1. On March 9, 2022, Mr. Celentano was arrested in Broad Channel, New York on charges relating to the events on January 6, 2021 at the U.S. Capitol.
2. On March 9, 2022, Mr. Celentano was released on an appearance bond with several conditions in the Eastern District of New York.
3. One of Mr. Celentano's conditions of release is that his travel be restricted to the Eastern District of New York.
4. Pretrial Services in the Eastern District of New York is supervising Mr. Celentano as a courtesy to Pretrial Services in the District of Columbia.
5. On November 28, 2022, defense counsel conferred with Pretrial Services from both the Eastern District of New York and the District of Columbia, as well as the government, and they do not object to this request.

Conclusion

Wherefore, for the foregoing reasons, Mr. Celentano respectfully requests that the Court order the aforementioned temporary modification to the bail conditions previously imposed on Mr. Celentano.

Respectfully submitted,

/s/

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