UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,)
v. JOSEPH HACKETT, Defendant.)) No. 22-cr-15 (APM)-7))))
	<u>ORDER</u>
AND NOW, this day of	, 2022, upon consideration of
Defendant's Consent Motion to Modify Con	nditions of Pretrial Release, it is hereby ORDERED
that the motion is GRANTED . Defendant	Joseph Hackett's Additional Conditions of Pretrial
Release, 7(t), shall be modified to reflect the	e following:

Defendant is not to have any access to computers, smartphones, tablets or any device that would allow him to communicate through either encrypted or non-encrypted applications; however, Defendant shall be permitted to personally access a desktop or laptop computer for video and/or audio conferences with counsel and to connect to remote Court proceedings. Further, Defendant shall be permitted access to a desktop or laptop computer under the following limited conditions: 1) to review discovery materials that are not subject to the Protective Order by himself, and 2) to review discovery materials subject to the Protective Order with counsel via video conference.

All other conditions of Pretrial Release shall remain the same.

The Honorable Amit P. Mehta United States District Court Judge

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,)	
)	
)	
)	
v.)	No. 22-cr-15 (APM)-7
)	
JOSEPH HACKETT,)	
)	
Defendant.)	
)	

JOSEPH HACKETT'S CONSENT MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE

Defendant, Joseph Hackett, by and through his undersigned counsel, Angela Halim, Esq., hereby respectfully requests the Court grant his motion and amend conditions of pretrial release so that Mr. Hackett can access a computer on a limited basis. In support thereof, Mr. Hackett avers as follows.

- 1) On August 23, 2021, the Court entered an Order Setting Conditions of Release, ECF 362, 21-cr-28. The Court ordered, among other special conditions, that Mr. Hackett "is not to have any access to computers, smartphones, tablets, or any device that would allow him to communicate through either encrypted or non-encrypted applications." Additional Conditions of Release, section 7(t), p. 3.
- 2) Mr. Hackett submits this consent request to modify section 7(t) to allow limited personal computer access for the purpose of participating in remote Court proceedings, video and/or audio conferences with counsel, and for discovery review.
- 3) The government has advised that it does not oppose Mr. Hackett's request to modify section 7(t) as outlined in the attached, proposed Order.

- 4) Mr. Hackett resides in Florida and his undersigned counsel in Philadelphia. As such, Mr. Hackett and counsel primarily communicate via video conference by computer. Pretrial Services allows Mr. Hackett very limited access to a computer under his wife's supervision. To most effectively assist counsel in preparing for trial, Mr. Hackett's seeks a limited expansion of his ability to access and use a computer for remote court proceedings, video conferences with counsel, and to review discovery materials.
- 5) To review discovery, Mr. Hackett and counsel review materials together while video conferencing. As previously referenced, to comply with the conditions set forth at section 7(f), Mr. Hackett's wife must set up the computer, connect to the video conference, and personally monitor him the entire time he is on the computer. Mr. Hackett respectfully requests that he be permitted personal access to a desktop or laptop computer so that he can review non-protected discovery materials on his own, without relying on his wife's availability.
- 6) With regard to the review of discovery materials subject to the Court's April 1, 2021 (ECF 123 21-cr-28), it is imperative that Mr. Hackett have privacy to review those materials during video conferences with counsel.
- 7) Mr. Hackett is in compliance with all terms of Pretrial Release. He does not seek to alter any other release condition at this time, except as outlined herein.

8) For all the reasons set forth above, Mr. Hackett respectfully requests the Court enter the attached proposed Order to allow limited, personal access to a computer.

Respectfully submitted,

/s/ Angela Halim

Angela Halim, Esq., 3580 Indian Queen Lane Suite 10A Philadelphia, PA 19129 (215) 300-3229 angiehalim@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of Court using CM/ECF. I also certify that the foregoing is being served this day on all counsel of record, via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Angela Halim_
Angela Halim, Esq.

Dated: August 2, 2022