

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

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

**ORDER**

**AND NOW**, this \_\_\_\_ day of \_\_\_\_\_, 2022, upon consideration of Defendant’s Motion to Modify Conditions of Pretrial Release, it is hereby **ORDERED** that the motion is **GRANTED**. The defendant’s conditions of pretrial release shall be modified as follows:

- 1) Mr. Hackett is permitted to travel between the Middle District of Florida and the Eastern District of Virginia, beginning December 2, 2022;
- 2) Mr. Hackett is also permitted to travel between the Eastern District of Virginia and the District of Columbia during his trial; he is further permitted to stay in Chesapeake, Virginia when court is not in session.

All other conditions of Pretrial Release shall remain the same.

\_\_\_\_\_  
**The Honorable Amit P. Mehta**  
**United States District Court Judge**

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v.	)	No. 22-cr-15 (APM)-7
	)	
JOSEPH HACKETT,	)	
	)	
Defendant.	)	
	)	

**JOSEPH HACKETT’S UNOPPOSED 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 modify conditions of pretrial release so that Mr. Hackett can travel from his residence in Florida to the District of Columbia for trial, currently scheduled to begin December 5, 2022. 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’s travel is restricted to the Middle District of Florida, the District of Columbia, and the Eastern District of Pennsylvania (for attorney visits). Additionally, Mr. Hackett is subject to home incarceration and location monitoring. *See* ECF 362, Crim. No. 1-cr-28,
- 2) Mr. Hackett’s trial is scheduled to begin Monday, December 5, 2022. Mr. Hackett’s mother and father-in-law reside in Chesapeake, VA, an approximately three-hour drive to the federal courthouse in Washington, D.C. Mr. Hackett and his wife plan to

drive from their residence in Florida to Chesapeake, VA on Friday December 2, 2022.

Mr. Hackett, through counsel, has provided the government and Pretrial Services with the address and contact information for Mr. Hackett's mother and father-in-law.

- 3) Mr. Hackett plans to stay in a hotel in or around the D.C. area Monday through Friday when Court is in session. He seeks permission to travel between the D.C. area and his in-laws' home in Chesapeake, VA on the weekends.
- 4) Pretrial Services Officer Kadi Murray (M.D.Fl.) advised by email dated October 27, 2022, that she has "no concern" about Mr. Hackett's travel plans during trial and he has remained "totally compliant with his conditions of release thus far." The government advised that it defers to Pretrial Services.
- 5) For all the reasons set forth above, Mr. Hackett respectfully requests the Court enter the attached proposed Order to allow travel as outlined herein in connection with his trial scheduled to begin December 5, 2022.

Respectfully submitted,

/s/ Angela Halim  
Angela Halim, Esq.,  
3580 Indian Queen Lane  
Suite 10A  
Philadelphia, PA 19129  
(215) 300-3229  
[angiehalim@gmail.com](mailto: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: November 1, 2022