

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

UNITED STATES OF AMERICA	:	CR#22-0074
	:	
v.	:	
	:	
RACHEL MYERS	:	

**MOTION TO MODIFY CONDITIONS OF PRE-TRIAL RELEASE:
PERMISSION TO TRAVEL TO FLORIDA**

TO THE HONORABLE JIA M. COBB, JUDGE OF THE UNITED STATES COURT FOR THE DISTRICT OF COLUMBIA:

AND NOW COMES THE DEFENDANT RACHEL MYERS, by and through her attorney Thomas F. Burke, Esquire, who hereby avers the following facts and requests the following relief:

1. Rachel Myers was charged by way of complaint with Entering into a Restricted Building or Grounds and Disorderly Conduct on Capital Grounds, in violation of 18 U.S.C. §1752(a)(1) and 40 U.S.C. 5104(e)(2)(D) and (G).
2. The defendant was arrested by way of an arrest warrant in November of 2021, and appeared before D.C. Magistrate Judge Zia Faruqui, December 9, 2021 where she entered a plea of not guilty. Judge Faruqui ordered standard conditions of release including restricting the defendant's travel to the Eastern District of Pennsylvania. This Court later expanded her travel restrictions to include the State of New Jersey.
3. Defendant wishes to travel to Palm Springs Florida, September 4th through September 8, 2022, to celebrate the birthday of a life-long friend.
4. Counsel for the defendant has spoken to assigned AUSA Jennifer Rozzini regarding this request, and she has no objections.

WHEREFORE, the defendant Rachel Myers respectfully requests this Court Modify her Conditions of Pre-Trial Release and allow her to travel to Palm Springs Florida, September 4th through September 8, 2022.

Respectfully submitted,

Thomas F. Burke, Esquire

Thomas F. Burke, Esquire
Counsel to Rachel Myers

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ORDER

AND NOW, this _____ day of _____, 2022,
upon consideration of the attached Motion to Modify Conditions of Pre-Trial Release,
and there being no objections thereto by the government, said Motion is GRANTED.
The defendant may travel to Palm Springs Florida from September 4th through September
8, 2022.

BY THE COURT:

J.

CERTIFICATE OF SERVICE

I, Thomas F. Burke, Esquire, hereby certify that I have sent a true and correct copy of the foregoing Motion to Modify Conditions of Pre-Trial Release to the following persons this day via the ECF filing system.

AUSA Jennifer Rozzoni
District of New Mexico (on detail with the District of Columbia)

Date: **8/15/2022**

/s/ Thomas F. Burke, Esquire
Thomas F. Burke, Esquire
Counsel to Rachel Myers