

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. On August 15, 2022, your undersigned counsel filed a Motion with this court requesting permission for the defendant to travel to *Palm Springs*, Florida to attend a birthday celebration with a lifelong friend. This Court GRANTED that Motion on August 15, 2022.
4. Counsel inadvertently listed the destination as Palm Springs, Florida. The actual destination of travel is *Palm Beach*, Florida.
5. 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 Beach* Florida, September

4th through September 8, 20922. The defendant also requests this Court rescind its Order allowing her to travel to Palm Springs, Florida.

Respectfully submitted,

Thomas F. Burke, Esquire

Thomas F. Burke, Esquire
Counsel to Rachel Myers

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	:	
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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 Beach**, Florida from September 4th through September
8, 2022. The August 16th Order allowing the defendant to travel to **Palm Springs**,
Florida is hereby rescinded.

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: **8/16/2022**

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