

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 BALTIMORE, MD.

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 November 15, 2022, the defendant entered a plea of guilty before this Court to one count of Parading, Demonstrating or Picketing in a Capital Building in violation of 18 USC §5104(e)(2)(G). Sentencing is currently set for February 16, 2023.
4. The defendant would like to celebrate the New Year's in Baltimore, MD with friends. If granted permission, she would arrive on December 31st and depart on January 3, 2023. She will stay at the Inner Harbor Four Seasons Hotel.
5. Counsel for the defendant has spoken to assigned AUSA Eric Boylan regarding this request, and he has no objections.
6. The assigned pre-trial officer has also been notified of this request and 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 Baltimore, MD from December 31, 2022 through January 3, 2023.

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 Baltimore, MD from December 31, 2022 through January 3,
2023.

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 Eric Boylan
Federal District of Columbia

Date: **12/28/2022**

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