

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

HATCHETT SPEED,

Defendant.

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Criminal No. 22-mj-143 (ZMF)
Preliminary Hearing: July 21, 2022

**DEFENDANT'S UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE
TO TRAVEL TO ATTEND MEDICAL APPOINTMENT**

COME NOW the defendant, Hatchett Speed, by and through counsel, and respectfully requests that he be permitted to attend a medical appoint at Y Strap Doc, located at 9624 W. Linebaugh Avenue, Tampa, Florida on July 13, 2022 at 12:40 PM. In support of this motion, Mr. Speed states the following:

1. Mr. Speed was arrested on the above-captioned matter on June 22, 2022. He appeared before Magistrate Judge Zia M. Faruqui on June 23, 2022.
2. On June 23, 2022, Mr. Speed was released by this Court into the High Intensity Supervision Program (HISP), monitored by the Pretrial Services Agency (PSA) for the District of Columbia, and ordered into Home Detention.
3. Prior to his arrest and detention, Mr. Speed made an appointment with Dr. Joseph Cipriano, a Y-Strap doctor who specializes in a very specific type of chiropractic medicine. His appointment is currently scheduled for July 13, 2022 at 12:40 PM in Tampa, Florida.
4. Dr. Cipriano, himself, only provides services in two locations: Greenville, South Carolina and Tampa, Florida. Mr. Speed was able to secure an appointment at the

Tampa location, but the general wait time for an appointment is at least one month, and upwards of three months for the South Carolina location.

5. Mr. Speed has a history of neck and back pain stemming from his Navy service. His injuries originated mainly in 2014 and Mr. Speed has been treated by multiple doctors, physical therapists, and chiropractors since then.
6. Mr. Speed is hopeful that this "Y-Strap Protocol," which is not widely used, will be helpful in easing some of his pain.
7. Condition 7(p) of the Order Setting Conditions of Release (Docket # 10) requires that medical treatment be approved in advance by the pretrial services office. However, because the appointment is out of state, the agent requested that Mr. Speed receive court approval.
8. If permitted to attend his appointment, Mr. Speed will leave Virginia by car on July 11th, and sleep at a rest area about halfway between Virginia and Florida. He would email defense counsel and his pretrial officer upon arrival at the rest stop to confirm the location. On July 12th, Mr. Speed will stay at Econo Lodge Motel, located at 4732 N. Dale Mabry Highway, Tampa, Florida, before driving back to Virginia directly after his appointment on July 13th. He would again alert his pretrial officer and defense counsel of any rest area where he would sleep overnight.
9. Mr. Speed did execute a release allowing defense counsel to speak with Dr. Cipriano's office to confirm his appointment. Undersigned counsel did in fact speak with an office representative named Lucy, who confirmed that Mr. Speed is scheduled for an appointment with Dr. Cipriano at the Tampa location on July 13, 2022 at 12:40 PM.

10. Based on Mr. Speed's medical concerns and his compliance with the requirements set forth by the Court and Pretrial Services, it would be in the interest of justice to allow him to attend his appointment with Dr. Cipriano.
11. Accordingly, Mr. Speed respectfully requests that he be allowed to go to Y-Strap Doc in Tampa, Florida on July 13, 2022 for his medical appointment.
12. Undersigned counsel has spoken to Assistant United States Attorney Alexis Loeb who states that she has no opposition to this motion.
13. A draft order implementing this request is appended hereto.

Respectfully Submitted,

/s/ Courtney S. Dixon

Courtney S. Dixon, DC Bar # 1766415
Assistant Federal Public Defender
Counsel for Hatchett Speed
1650 King Street, Suite 500
Alexandria, VA 22314
(703) 600-0879 (O)
(703) 600-0880 (F)
Courtney_Dixon@fd.org

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of July, 2022, the undersigned electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

AUSA Alexis Loeb
Assistant United States Attorney
555 4th Street, NW
Washington, DC 20530

By: /s/ Courtney S. Dixon
Courtney S. Dixon, DC Bar # 1766415
Assistant Federal Public Defender
Counsel for Hatchett Speed
1650 King Street, Suite 500
Alexandria, VA 22314
(703) 600-0879 (O)
(703) 600-0880 (F)
Courtney_Dixon@fd.org