

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

UNITED STATES OF AMERICA)	
)	
)	
v.)	Case No. 22-cr-00027-TSC
)	
TYLER TEW,)	
)	
)	
Defendant)	
)	

DEFENDANT’S MOTION FOR MODIFICATION OF BOND

William L. Shipley, Jr., Esq.
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Attorney for Defendant

NOW COMES, defendant, Tyler Tew, by and through his undersigned counsel requesting this Honorable Court to grant the below Motion to Modify his Conditions of Bond to Travel.

As part of the conditions, Mr. Tew was ordered to surrender his passport to Pretrial Services for the District of Arizona.

Mr. Tew now moves this Court to grant permission to travel to San Jose De Cabo, Mexico from August 10, 2022, to August 15, 2022, for the purposes of a family trip that had been previously planned.

In making such a request, Mr. Tew attests that he will (1) provide Pretrial Services with an itinerary of his trip (including methods and modes of transportation, dates, and all planned locations to visit) (2) keep telephone contact with Pretrial Services, (3) cooperate and provide Pretrial services all requested and required information regarding travel.

In support of such motion, Mr. Tew has not been charged with a crime of violence nor a felony. Further, Mr. Tew has also been in full compliance with Pretrial Services since his release. Moreover, counsel has been in contact with Mr. Tew's Pretrial Services Officer who informed counsel she would not oppose Mr. Tew's trip.

CONCLUSION

For the foregoing reasons, Mr. Tew respectfully requests this Honorable Court to grant his petition to modify bond.

Dated: May 19, 2022

Respectfully submitted,

/s/ William L. Shipley
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CERTIFICATE OF SERVICE

I, William L. Shipley, hereby certify that on this day, May 19, 2022, I caused a copy of the foregoing document to be served on all counsel through the Court's CM/ECF case filing system.

/s/ William L. Shipley
William L. Shipley, Jr., Esq.