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April 14, 2023

Via ECF

Hon. G. Michael Harvey
United States District Court
District of Columbia
333 Constitution Avenue N.W.
Washington D.C. 20001

**Re: United States v. Lizak
Docket No. 22-mj-203-5**

Dear Judge Harvey:

As Your Honor is aware I represent Jon Lizak in the captioned matter. Lizak is 23 years old and without any criminal history. He was originally arraigned in this matter on September 22, 2022, on a misdemeanor charge and released on an unsecured bond with customary travel restrictions.

I write to respectfully request a modification of Lizak's conditions of release. Since the inception of this matter, one of Lizak's conditions of release was that he not communicate with any of the co-defendants, in the absence of counsel. One of Lizak's co-defendants is Thomas Carey, who has been a hometown, lifelong friend of Lizak's with whom Lizak shares an extremely close relationship, as well as with Mr. Carey's other family members. Mr. Carey has already entered a guilty plea in this matter and our fruitful negotiations with the Government remain ongoing.

With this, I write to respectfully request that Mr. Lizak's conditions of release be modified so as to enable him to communicate with Mr. Carey.

I have conferred with AUSA Joseph Huynh, who offers his consent to this application.

Thank you for your consideration.

Very truly yours,

/s/ Kevin J. Keating

KEVIN J. KEATING

KJK/dg

cc: AUSA Joseph Huynh