

UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA

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UNITED STATES OF AMERICA,

22-mj-00203

- against -

JON LIZAK,

**MOTION TO  
TEMPORARILY  
MODIFY CONDITIONS  
OF RELEASE**

Defendant.  
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KEVIN J. KEATING, an attorney duly admitted to the practice of law affirms as follows:

1. I am attorney for Jon Lizak and, thus, fully familiar with the facts and circumstances of this case. This affirmation is submitted in furtherance of the instant motion to modify Lizak’s conditions of release.

2. 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. To date, Lizak has been fully compliant with the conditions of his release.

3. Since the inception of this matter, one of Lizak’s conditions of release has been 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 he does 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 freely communicate with Mr. Carey.

4. I have conferred with AUSA Joseph Huynh, who offers his consent to this application. I have attempted to confer with Pretrial Services Officer Marnie Gerardino, but my attempts to contact her have been unsuccessful.

WHEREFORE, it is respectfully requested that the Court grant the requested relief.

Dated: Garden City, New York  
April 17, 2023

Respectfully submitted,

LAW OFFICE OF KEVIN J. KEATING, P.C.

*/s/ Kevin J. Keating* \_\_\_\_\_

By: Kevin J. Keating, Esq.  
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To: AUSA Joseph Huynh