

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

**UNITED STATES OF AMERICA**

**V.**

**ROBINSON, SR et al**

## Defendant

**Case No. 22-cr-00251-ABJ**

**DEFENDANT BENJAMIN SCOTT ROBINSON'S MOTION  
TO MODIFY CONDITIONS OF RELEASE TO ALLOW  
INTERSTATE TRAVEL FOR BUSINESS PURPOSES**

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*Attorney for Defendant*

NOW comes Defendant Benjamin Robinson by and through his undersigned counsel of record William L. Shipley, and respectfully requests that this Honorable Court modify his conditions of release to allow interstate travel for business purposes for November 17-20, 2023.

Defendant Benjamin Robinson's release conditions limit his travel to the state of North Carolina.

Defendant Benjamin Robinson requests permission to travel to Baltimore Maryland for the purpose of attending the American Towman Exposition in which takes place November 16-20, 2022.

Defendant Benjamin Robinson has made multiple requests for permission to travel to Baltimore from his Pre-Trial Services Officer in the Eastern District of North Carolina. As of the date of this motion he has not received a response one way or the other with regard to his request for authorization to make this trip.

Defendant Benjamin Robinson's he will stay at Horseshow Casino and Hotel located at 1525 Russel St. Baltimore, Maryland, 21230. He will be travel to and from Baltimore by car with his brother Linwood Robinson, Jr.

Linwood Robinson, Jr., is a co-Defendant who is supervised out of the District of South Carolina, and has received permission from Pre Trial-Services in South Carolina to attend the convention.

Defendant Benjamin Robinson is charged only with misdemeanor offenses not involving any violence.

### **CONCLUSION**

For the foregoing reasons, Defendant Benjamin Robinson respectfully requests this Honorable Court to modify his conditions of pretrial release and allow him to travel to Baltimore, Maryland for a business-related conference.

Dated: November 16, 2022

Respectfully Submitted,

/s/ William L. Shipley  
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