

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

UNITED STATES OF AMERICA,

Plaintiff, :

vs. :

: Case No: 1:23-cr-00272

ROBERT HANNA :

Judge Timothy J. Kelly

Defendant. :

**DEFENDANT’S MOTION TO AMEND PRETRIAL RELEASE CONDITIONS**

Now comes the Defendant, Robert Hanna (“Mr. Hanna”), by and through counsel, and hereby requests that this Court enter an Order modifying the conditions of pretrial release. As grounds for this motion, counsel states the following.

On or about July 27, 2023, Magistrate Judge Robin M. Meriweather executed an Order Setting Mr. Hanna’s Conditions of Release. As part of the Order, Mr. Hanna was authorized to travel for work to the Southern District of Ohio, Northern District of Ohio, Southern District of Indiana and Western District of Kentucky.

Recently, Mr. Hanna was asked to travel for work to the Eastern District of Kentucky. Counsel respectfully requests that the Court enter an order permitting this travel. Mr. Hanna’s pretrial officer, Patrick Kennedy, does not oppose this motion. Counsel for the government, Courtney Howard, does not oppose this motion.

**III. Conclusion**

For the above reasons, Counsel asks that the Court enter an Order extending Mr. Hanna’s employment travel to the Eastern District of Kentucky.

Respectfully submitted:

JOSEPH MEDICI  
Federal Public Defender

by s/James Sanchez  
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Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon Courtney Howard, Assistant United States Attorney, on the date same was filed.

s/James Sanchez  
James Sanchez