

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CASE NO.: 1:23-MJ-00042

UNITED STATES OF AMERICA,

vs.

MICHAEL DANIELE,

Defendant.

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UNOPPOSED MOTION TO MODIFY PRE-TRIAL CONDITIONS

Defendant, MICHAEL DANIELE, by and through his attorney, files this his unopposed motion to modify pre-trial conditions and states as follows:

1. That on March 1, 2023 this court filed a Pretrial Services Report for United States District Court.
2. That one of the recommendations states: “Abide by the following restrictions on personal association, residence or travel: Defendant must notify the Pretrial Services – District of New Jersey/Newark in advance of any travel outside of the district. Defendant must receive Court approval before travel outside of the Continental United States.”
3. That Defendant would like to modify that provision to be allowed travel outside the district for work within the Continental United States without the need to notify Pretrial Services. The Defendant has a boat hauling business that requires him to travel outside the district often.
4. That all other conditions of the Pretrial Services Report for the United States District Court will remain in full force and effect.
5. Counsel for Defendant has conferred with AUSA Sarah C. Martin and Nailah Green, U.S. Pretrial Services Officer and they have no objection to the filing of this motion.

WHEREFORE, the Defendant, MICHAEL DANIELE, respectfully requests that the Court grant this motion and allow Defendant to travel outside the district within the Continental United States for work without the need to contact pretrial services in advance.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed with the Clerk via the CM/ECF and an electronic notification was sent via email to Sarah.Martin@usdoj.gov, Sarah C. Martin, Assistant United States Attorney, U.S. Attorney's Office for the District of Columbia, 601 D Street Northwest Washington, D.C. 20001 and Nailah_Green@njpt.uscourts.gov, Nailah Green, Pretrial Services Officer, U.S. Pretrial Services Agency, 402 East State Street, Suite 100, Trenton, New Jersey, 07608 this 2nd day of May, 2023.

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