

MICHAEL PANCER
California State Bar No. 43602
105 West "F" Street, 4th Floor
San Diego, CA 92101
Telephone: (619) 236-1826
Fax: (619) 233-3221
Email: mpancer@hotmail.com

Attorney for Defendant
LEO JOSEPH HAMEL

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HONORABLE BERNARD G. SKOMAL)**

UNITED STATES OF AMERICA,)	Criminal Case No. 19-cr-4768-GPC-2
Plaintiff,)	
v.)	MOTION TO MODIFY CONDITIONS OF
)	BOND
LEO JOSEPH HAMEL,)	
Defendant.)	

**TO: ROBERT S. BREWER, JR., U.S. ATTORNEY; ANDREW HADEN, ASSISTANT
U.S. ATTORNEY; NICHOLAS PILCHAK, ASSISTANT U.S. ATTORNEY; and
MARCIA FLORES, U.S. PRETRIAL SERVICES OFFICER**

Now comes Leo Hamel, by and through his attorney Michael Pancer, and hereby moves
this Court to modify the conditions of his bond to allow him to travel to Pretoria, South Africa,
from January 7, 2020 to January 16, 2020, for a business trip relating to his antique business.

Mr. Hamel also moves this Court to return his passport.

On January 7, 2020, he would fly from Los Angeles, California (LAX) to Johannesburg,
South Africa (JNB). He would stay at the Marriott Hotel in Pretoria, South Africa. On January
15, 2020, he would fly from Johannesburg, South Africa to San Diego, California.

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2 The Assistant U.S. Attorneys assigned to this case, Nicholas Pilchak and Andrew Haden,
3 do not oppose this motion.

4 Mr. Hamel's U.S. Pretrial Services Officer, Marcia Flores, does not oppose this motion.

5 Attached to this motion are the signed acknowledgements/consents from the two sureties
6 on Mr. Hamel's bond stating that he is traveling late January/early February. They will be
7 signing new acknowledgements/consents with corrected dates. We will e-file those when they
8 are received. However, they have verbally told us they are okay with Mr. Hamel traveling to
9 South Africa from January 7, 2020 to January 16, 2020.
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11 Respectfully submitted,
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13 DATED: December 27, 2019
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S/Michael Pancer

15 MICHAEL PANCER
16 Attorney for Leo Hamel
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