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6 LEO JOSEPH HAMEL

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

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 LEO JOSEPH HAMEL,

16 Defendant.
17

Criminal Case No. 19-cr-4768-GPC-2

**AMENDED MOTION TO MODIFY
CONDITIONS OF BOND**

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

22 Now comes Leo Hamel, by and through his attorney Michael Pancer, and
23 hereby moves this Court to modify the conditions of his bond to allow him to
24 travel to Pretoria, South Africa, from January 7, 2020 to January 16, 2020, for a
25 business trip relating to his antique business.
26

27 Mr. Hamel also moves this Court to return his passport.
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1 On January 7, 2020, he would fly from Los Angeles, California (LAX) to
2 Johannesburg, South Africa (JNB). He would stay at the Marriott Hotel in
3 Pretoria, South Africa. On January 16, 2020, he would fly from Johannesburg,
4 South Africa to San Diego, California.
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6 The Assistant U.S. Attorneys assigned to this case, Nicholas Pilchak and
7 Andrew Haden, do not oppose this motion.
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9 Mr. Hamel's U.S. Pretrial Services Officer, Marcia Flores, does not oppose
10 this motion.
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12 Attached to this motion as Exhibit A are the signed acknowledgements/
13 consents from the two sureties on Mr. Hamel's bond.
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15 Respectfully submitted,
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17 DATED: December 30, 2019
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S/Michael Pancer
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20 MICHAEL PANCER
21 Attorney for Leo Hamel
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