

1 **MICHAEL PANCER**

2 California State Bar No. 43602

3 105 West "F" Street, Fourth Floor

4 San Diego, California 92101

5 Telephone: (619) 236-1826

6 Fax: (619) 233-3221

7 Email: mpancer@hotmail.com

8 Attorney for Defendant

9 **LEO JOSEPH HAMEL**

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

13
14 UNITED STATES OF AMERICA,)

Case No. 19-cr-4768-GPC (BGS)-2

15 Plaintiff,)

MOTION TO MODIFY
CONDITIONS OF BOND

16 v.)

17)
18 LEO JOSEPH HAMEL,)

19 Defendant.)
20)

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22 TO: ROBERT S. BREWER, JR., U.S. ATTORNEY,
23 ANDREW HADEN, ASSISTANT U.S. ATTORNEY,
24 NICHOLAS PILCHAK, ASSISTANT U.S. ATTORNEY, and
25 MARCIA FLORES, U.S. PRETRIAL SERVICES OFFICER.

26 Now comes Michael Pancer and states he is the attorney of record for
27 Leo Hamel in the above-entitled matter.

On behalf of Mr. Hamel, I make the following requests:

1. Expand the travel conditions of Mr. Hamel's bond to allow him to visit Orange County and Los Angeles County upon notification to his U.S. Pretrial Services Officer. There is a business consultant there who he wants to consult. In addition his sister Linda Morrison lives in that area, and he would like to be able to visit her.
2. Sometime at the end of October, we request that his bond conditions be expanded so that he can travel to Serbia and Croatia upon approval of his U.S. Pretrial Services Officer. There are search engine optimization companies there that market to American companies. The services they offer are comparable to those in the United States. However, they are more economical. After that trip, he would like to go to South Africa to visit relatives and then onto Swaziland as there is an orphanage for the handicapped there that he supports. We cannot supply the exact dates. Because of the pandemic it is difficult to maintain definite reservations, as the airlines are canceling numerous flights.
3. At the time of Mr. Hamel's arrest, ATF seized the passports of Mr. Hamel that he will need for these trips. Mr. Hamel has a Canadian/Swaziland passport which he will need to book the flight. Americans are not allowed to travel to any other places due to Covid spikes. But locals' (Swazis and South Africans) close friends and relatives and Canadians are allowed to travel to places where Americans are not allowed to travel. Mr. Hamel will also need his U.S. passport book and card.
4. We would ask that all travel restrictions within the United States be lifted upon notification by Mr. Hamel to his U.S. Pretrial Services Officer. Prior to any trips, he would inform his U.S. Pretrial Services Officer as to his destination, his lodgings in those destinations to the extent possible, his contact information, and the purpose of the trip.

1 Attached are the “Acknowledgment and Consent Re: Modifying
2 Conditions of Leo Hamel’s Bond” signed by the two sureties on his bond, Lisa Hamel
3 and Micha Mottale,

4 The Assistant U.S. Attorney assigned to this case, Nicholas Pilchak, does
5 not oppose this motion.

6 Mr. Hamel’s U.S. Pretrial Services Officer Marcia Flores does not
7 oppose this motion.
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10 Dated: August 26, 2020

Respectfully submitted,

11 S/Michael Pancer

12 _____
Attorney for Defendant Leo Hamel

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14 S/Nicholas Pilchak

15 _____
16 Assistant U.S. Attorney

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18 S/Marcia Flores

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20 U.S. Pretrial Services Officer
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