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8 Attorney for Defendant  
9 LEO JOSEPH HAMEL

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

13 UNITED STATES OF AMERICA,  
14 Plaintiff,

15 v.

16 LEO JOSEPH HAMEL,  
17 Defendant.

Case No.:  
19-CR-4768-GPC (BGS)-2

**MOTION TO MODIFY  
CONDITIONS OF RELEASE  
ON BOND**

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20 TO: RANDY GROSSMAN, U.S. ATTORNEY, NICHOLAS PILCHAK,  
21 ASSISTANT U.S. ATTORNEY, and RUSSEL PARRIS U.S. PRETRIAL  
22 SERVICES OFFICER.

23  
24 Now comes Leo Joseph Hamel, by and through his attorney Michael Pancer,  
25 and hereby moves this Court to modify the conditions of his bond to allow him to  
26

1 travel to South Africa from July 25, 2022, through August 10, 2022, with his family.  
2 Mr. Hamel plans to fly from LAX to Dubai for one night and then fly from Dubai to  
3 South Africa. While in South Africa he plans to travel to Eswatini, Zimbabwe, and  
4 Botswana. They will be flying back to the LAX on August 10, 2022.  
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6 Mr. Hamel request Pretrial Services return his three passports from Canada,  
7 United States, and Swaziland (now Eswatini).  
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9 The Assistant U.S. Attorney assigned to this case, Nicholas Pilchak, does not  
10 oppose this motion.  
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12 Mr. Hamel's U.S. Pretrial Service Officer Russel Parris does not oppose this  
13 motion and request Mr. Hamel give pretrial services his itinerary prior to traveling  
14 and call upon returning.  
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17 Dated: July 6, 2022.

Respectfully Submitted,

18 s/Michael Pancer

19 MICHAEL PANCER  
20 Attorney for Defendant  
21 LEO JOSEPH HAMEL  
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