

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA,

v.

Case No. 23-CR-342
**UNOPPOSED MOTION
MODIFY BOND
CONDITIONS**

HORST JICHA,

Defendant.

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Horst Jicha, through undersigned counsel, hereby files this Unopposed Motion to Modify Bond Conditions, and in support thereof states as follows:

1. Mr. Jicha was arrested on December 27, 2023, in the Southern District of Florida.
2. On January 17, 2024, Mr. Jicha was released from pretrial detention on stipulated bond conditions, and his case was removed from the Southern District of Florida to the Eastern District of New York.
3. Mr. Jicha has been living with his partner, Ewa Jicha, in the E.D.N.Y. while on bond. He has been fully compliant with the conditions of his bond.
4. Mr. Jicha asks this Court to modify his conditions of bond to allow him to go to a local gym to exercise for two hours each day. The gym, Retro Fitness, is located at 2244 Church Avenue, Brooklyn, New York 11226. The two-hour time limit would include his travel to and from the gym and would occur during a time in the day that has been pre-approved by Pre-Trial Services.
5. Undersigned counsel has conferred with counsel for the Government. The Government does not oppose Mr. Jicha’s request. Pre-Trial Services has also approved this request.

WHEREFORE, Mr. Jicha respectfully requests this Court grant his Unopposed Motion to Modify Bond Conditions.

Dated: February 28, 2024

Respectfully submitted,

/s/ Marissel Descalzo

Marissel Descalzo, Esq.

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Counsel for Horst Jicha

CERTIFICATE OF SERVICE

I CERTIFY that on February 28, 2024, the foregoing document was filed electronically via CM/ECF which will serve all parties of record.

/s/ Marissel Descalzo

Marissel Descalzo, Esq.