

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

**UNITED STATES,
Plaintiff,**

v.

Case No. 1:23-cr-20036-KMM

**DANIELA RENDON,
Defendant.**

**UNOPPOSED MOTION TO ALLOW RETURN OF PASSPORT-
MODIFY CONDITIONS OF RELEASE**

COMES NOW the Defendant, Daniela Rendon, by and through the undersigned Counsel, and submits her unopposed motion to allow for the return of the Defendant's neice's passport to allow the niece to travel to Columbia for a summer visit with her mother, who resides in Columbia; a modification of one of the conditions of her release prior to Sentencing, and as grounds therefore alleges as follows:

1. The Defendant has entered into a plea agreement in this case and anticipates being sentenced on August 10, 2023 at 2:00 p.m.
2. The Defendant and her family, including her niece, Mannuela Heredia Rendon, had agreed to surrender of their passports as a condition of the

Defendant's release prior to sentencing:

3. The Defendant's niece according to regular visitation with her parents, was to visit with her mother during the summer vacation months and needs her passport returned in order to return to Columbia to have her regular visitation with her mother.

4. The Defendant's counsel did ask her Probation Officer, Juan Lora, for Probation's position and he has stated that he had no objections on the return of the niece's passport.

5. On May 1, 2023, the undersigned conferred with Assistant United States Attorney, Jonathan Bailyn, who advised that he has no objection to the mentioned conditions of the Defendant's release.

For the foregoing reasons, the Defendant respectfully requests that the Court grant this Motion to modify the above-mentioned conditions of the Defendant's release, and allow the niece, Mannuela Heredia Rendon to have her passport returned.

DATED this 12th day of July, 2023.

Respectfully submitted,

/s/ Robert Mandell

ROBERT I. MANDELL, ESQ.

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/s/ Asad Ali

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CERTIFICATE OF SERVICE

On July 12, 2023 via Conventional Filing, I filed the foregoing with the clerk of the court which will send notice to: US Attorney's Office, Southern District of Florida, 99 NE 4th Street, Miami, FL 33132.

/s/ Robert Mandell
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