

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

**UNITED STATES,  
Plaintiff,**

**v.**

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

**DANIELA RENDON,  
Defendant.**

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**REVISED UNOPPOSED MOTION TO ALLOW RETURN OF  
PASSPORT- MODIFY CONDITIONS OF RELEASE  
(Pursuant to US Probation's request)**

**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.

6. The Court did issue Paperless Order 52, allowing the return of the Defendant's Niece, Mannuela Heredia Rendon's, passport.

7. On July 18, 2023, Bernisa Mejiah of the Miami office of United States Probation forwarded an email advising the Clerk cannot mail the passport to the Defendant's attorney who is based in Orlando, Florida, as well as advising the green card had been surrendered and the order would need to be modified to indicate the green card is to be returned as well.

8. We were instructed to request the green card and passport of Ms. Rendon's niece be mailed directly to the United States Probation Office at 400 N. Miami Avenue, 9<sup>th</sup> Floor, Miami, FL 33125, c/o Bernisa M. Mejia or Juan Lora.

For the foregoing reasons, the Defendant respectfully requests that the Court grant this Revised 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 18<sup>th</sup> day of July 2023.

Respectfully submitted,

/s/ Robert Mandell

**ROBERT I. MANDELL, ESQ.**

FBN: 15484

/s/ Asad Ali

**ASAD ALI, ESQ.**

**CO-COUNSEL**

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**CERTIFICATE OF SERVICE**

On July 18, 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 4<sup>th</sup> Street, Miami, FL 33132.

/s/ Robert Mandell

**ROBERT I. MANDELL, ESQ.**

FBN: 15484

/s/ Asad Ali

**ASAD ALI, ESQ.**

**CO-COUNSEL**

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