UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA, Plaintiff,	)	
	)	Case No: 4:26-cr-00174-MS-JMB-4
v.	)	
DANA KELLY, Defendant.	)	July 7, 2026

DEFENDANT'S MOTION TO MODIFY ORDER SETTING CONDITIONS OF RELEASE

COMES NOW attorney Dramon M. Foster, on behalf of the Defendant, Dana Kelly, and requests that this Court modify the Order Setting Conditions of Release to allow Ms. Kelly to travel outside of the Eastern District of Missouri to Illinois. In support thereof, Counsel states:

1. On April 20, 2026, Ms. Kelly appeared before the Hon. John M. Bodenhausen, United States Magistrate Judge, for her initial appearance, arraignment, and bond execution hearing.
2. Ms. Kelly was granted pretrial release subject to various conditions. See Doc. No. 61. One such condition is that Ms. Kelly's "Travel restricted to the Eastern District of Missouri with travel outside the district only allowed with Court permission."
3. Ms. Kelly is currently doing Uber as a means of income. She lives 3 miles from the State of Illinois and it is likely she will get rides into the State. She would also like to seek additional job opportunities in Illinois.
4. Counsel has discussed this matter with Ms. Kelly's pretrial officer, Lauren Gilkeson, who indicated she had no objection to modifying Ms. Kelly's conditions to allow her to travel

outside of the Eastern District of Missouri into the state of Illinois for work purposes.

5. Accordingly, Ms. Kelly requests that Section 7, part (f) of the order setting conditions of release be amended as follows:

> Defendant's travel is restricted to the Eastern District of Missouri with travel outside the district only allowed with Court permission, except for travel to the State of Illinois for work purposes.

WHEREFORE, for the reasons stated above, defendant requests the Order Setting Conditions of Release (Doc No. 61) be modified to allow for her to enter the State of Illinois for work purposes.

RESPECTFULLY SUBMITTED,

/s/ Dramon M. Foster

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CERTIFICATE OF SERVICE

Signature of the foregoing is also certification that the foregoing was filed electronically with the Clerk of the United States District Court for the Easter District of Missouri to be served by operation of the electronic filing system upon the United States Attorney's Office, this 7th day of July 2026.

/s/ Dramon M. Foster
Dramon M. Foster