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Attorney for Defendant NATHAN NEPHI ZITO

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

<p>UNITED STATES OF AMERICA,</p> <p style="text-align: right;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>NATHAN NEPHI ZITO,</p> <p style="text-align: right;">Defendant.</p>	<p>Cause No.: CR 22-113-BLG-SPW</p> <p style="text-align: center;">MOTION TO AMEND PROBATION CONDITIONS</p>
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NATHAN NEPHI ZITO, by and through counsel, hereby moves the Court to amend his conditions of release to (1) replace his home arrest condition with a curfew condition; and (2) allow Mr. Zito to travel for family purposes in August of 2023.

Mr. Zito makes this Motion pursuant to 18 U.S.C. § 3563(c) and Federal Rule of Criminal Procedure 32.

The government objects to amending his home arrest condition.

The government has no objection to his proposed August travel.

The reasons for the requested amendment are set forth in the accompanying brief.

DATED this 11th day of July, 2023.

DATSOPOULOS, MacDONALD & LIND, P.C.

By: /s/ Peter F. Lacny
Peter F. Lacny
Attorney for Nathan Nephi Zito

CERTIFICATE OF SERVICE

L.R. 5.2(b)

I, Peter F. Lacny, attorney for Defendant, hereby certifies that a copy of the Defendant's Motion was served on these persons by the following means:

- 1, 2 CM/ECF
- Hand Delivery
- Mail
- Overnight Delivery Service
- Fax
- 3,4 Email

1. Clerk, U.S. District Court
2. Bryan Dake and Jeremy Goldstein, U.S. Attorney Office
3. U.S. Probation Office
4. Nathan Nephi Zito

DATED this 11th day of July, 2023.

By: /s/ Peter F. Lacny
Peter Lacny