

1 MEGHAN BLANCO (238171)  
LAW OFFICES OF MEGHAN BLANCO  
2 28202 Cabot Road, Suite 300  
Laguna Niguel, California 92677  
3 Telephone: (949) 296-9869  
Facsimile: (949) 606-8988  
4 E-mail: mblanco@meghanblanco.com  
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7 UNITED STATES DISTRICT COURT  
8 FOR THE SOUTHERN DISTRICT OF CALIFORNIA  
9

10 UNITED STATES OF AMERICA,  
11 Plaintiff,  
12 v.  
13 TORRANCE HATCH,  
14 Defendant.  
15  
16

No. CR 23-CR-1201-CAB

APPLICATION TO MODIFY THE  
CONDITIONS OF RELEASE TO  
PERMIT MR. HATCH TO HAVE  
CONTACT WITH HIS FIANCE

17 Defendant Torrance Hatch, by and through his counsels of record, moves  
18 this Court for orders modifying the conditions of his pretrial release so he may have  
19 contact with his fiancé.  
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21 Respectfully Submitted,

22 Dated: January 10, 2024

23 //s// Meghan Blanco  
24 MEGHAN BLANCO  
25 COUNSEL FOR DEFENDANT  
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1 MEMORANDUM OF POINTS AND AUTHORITIES

2 On June 16, 2023, federal agents arrested Mr. Hatch inside the San Diego  
3 Superior Court. (ECF 1). On June 15, 2023, Mr. Hatch made his initial appearance in  
4 federal court. (ECF 5). Over Mr. Hatch’s objection, the United States moved to  
5 continue the detention hearing to June 20, 2023, after the three-day weekend. (*Id.*).  
6 On June 20, the Magistrate Court set bond. The government made an oral motion to  
7 stay the Magistrate Judge’s ruling pending appeal to the District Court. That motion  
8 was denied. (ECF 12-13). The government thereafter filed a written motion to stay the  
9 Magistrate Judge’s ruling. (ECF 14). Its motion was again denied. (ECF 16). The  
10 government appealed the Magistrate Judge’s release order to the District Court. (ECF  
11 22). On June 22, 2023, the District Court ordered Mr. Hatch’s release on bond. As a  
12 condition of release, the Court ordered Mr. Hatch not to communicate with any  
13 witnesses in his case. Although Mr. Hatch’s fiancé, Rajel Nelson, was not present in  
14 California during his arrest for being a felon in possession of a firearm, the government  
15 notified the Court that it believed she may be a witness and did not want Mr. Hatch to  
16 communicate with her, even though they lived together at the time and were engaged  
17 to be married. Mr. Hatch objected.

18 Over six months have elapsed since Mr. Hatch was released, and he is still not  
19 permitted to communicate with his fiancé. He respectfully requests that the Court  
20 modify the conditions of his release so he may communicate with her. Counsel has  
21 conferred with counsel for Ms. Nelson. They concur with this request.

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23 Respectfully submitted,

24  
25 /s/ Meghan Blanco

26 Counsel for Defendant