

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA

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) MOTION FOR CONDITIONS OF
) PRE-TRIAL RELEASE

NOW COME [REDACTED] and [REDACTED]
[REDACTED], pursuant to Title 18 United States Code, §3142, et seq, and moves the
Court to set conditions of pre-trial release for the defendant, [REDACTED] in
this matter. In support of this motion, the undersigned state to the Court the following:

- (1) On or about August 19, 2003, [REDACTED] was arrested on a federal arrest
warrant, issued against him in the United States District Court for the Middle
District of North Carolina, alleging a violation of Title 18 United States Code,
§922(g)(1) and 924(a)(2).
- (2) On or about August 20, 2003, [REDACTED] appeared in the United States
District Court for the Western District of Virginia-Roanoke, VA before an
waived a Rule 40-Identity Hearing and Detention Hearing for further
proceedings in the United States District Court for the Middle District of
North Carolina.
- (3) On or about August 26, 2003, [REDACTED] was indicted by the Grand Jury for
the United States District Court for the Middle District of North Carolina in a

two (2) count Bill of Indictment, alleging violations of Title 18, United States Code, §922(a)(1) and 924(a)(2).

(4) [REDACTED] has never had a detention hearing, pursuant to Title 18, United States Code, §3142(e), in this matter.

(5) Since he has been in the custody of the United States Marshal's Service in the Middle District of North Carolina, [REDACTED] has suffered a severe rise in his blood pressure, which necessitated transportation to the emergency room of North Carolina Baptist Hospital, on August 26, 2003, and overnight hospitalization.

(6) [REDACTED] asserts that he is not a risk of flight or danger to the community.

(7) [REDACTED] asserts that there are conditions of pre-trial release that will insure his appearance at all proceedings in this matter.

WHEREFORE, the defendant moves the Court to conduct proceedings for the setting of conditions of pre-trial release in this matter.

This 29th day of August, 2003.

Respectfully submitted,

[REDACTED]

[REDACTED]

