


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

UNITED STATES OF AMERICA :
 :
v. :  :
 :
 :

MOTION TO AMEND CONDITIONS OF RELEASE

The Defendant, by and through undersigned counsel, hereby moves to amend his conditions of release so that he may accept an offer of employment. In support thereof, undersigned counsel states as follows:

1. The Defendant, and his four co-defendants, were originally arrested by state and federal authorities on date. On date, all five were indicted on various federal drug charges related to growing marijuana in the XXXXXXXXXXXX National Forest.

2. On insert date, the Court ordered that the Defendant be released on various conditions including, inter alia, home detention enforced by electronic monitoring. The Defendant was actually released the following day, date.

3. On insert date, the Defendant changed his plea to guilty, and the Court set sentencing for date.

4. The Defendant, who has a long history of stable employment, has not worked since his arrest on date. However, he has been offered a job by name, who does business as name,

address, telephone number. The Defendant anticipates that the position offered would involve assisting with the manufacture, sale, and delivery of custom jewelry, from approximately 10:00 a.m. to 5:00 p.m., five days per week.

5. Undersigned counsel has discussed this matter with Ms. Lisa B. Boggs, Assistant United States Attorney, who advised that she does not object to the requested modification.

6. Undersigned counsel has also discussed this matter with Ms. Elizabeth S. Walser, United States Pretrial Services Officer, who advised that the Defendant has adjusted well to supervision, and is in compliance with all release conditions. She further advised that she does not object to the requested modification.

For all of these reasons, the Defendant hereby moves for a modification of his release conditions so that he may accept the above-described offer of employment.

Respectfully submitted this the 11th day of January, 2002.

████████████████████
Federal Public Defender

████████████████████
Assistant Federal Public Defender
Arkansas State Bar No. ██████████
North Carolina State Bar No. ██████████
101 S. Elm Street, Suite 210
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon the following by hand delivery:

Ms. Lisa B. Boggs
Assistant United States Attorney
101 South Edgeworth Street, Suite 400
Greensboro, North Carolina 27401

Ms. Elizabeth S. Walser
United States Pretrial Services Officer
324 West Market Street, Room B-8
Greensboro, North Carolina 27401

This the 11th day of January, 2002.


Assistant Federal Public Defender

