

Defendant Clayton Ray Mullins, by and through undersigned counsel, respectfully moves this Honorable Court to modify the Order Setting Conditions of Release (ECF no. 11) issued on March 2, 2021 by Chief Judge Beryl A. Howell. Mr. Mullins was released on a personal recognizance bond with the condition of home detention under courtesy supervision by the Western District of Kentucky (WDKY) (ECF no. 11-1). The release order permitted Mr. Mullins to leave his residence for employment but restricted his travel to the WDKY. We specifically ask the Court to modify this provision and permit travel beyond the WDKY. That is, throughout Kentucky and to other states for employment purposes as approved by the United States Pretrial Services Office in the WDKY - Paducah Division.

Mr. Mullins owns and operates Mullins Machinery, LLC, in Hickory, Kentucky which buys, restores and sells trucks, trailers and heavy equipment. A critical part of this business is buying and selling machinery at auctions in Kentucky and nearby states. Assistant United States Attorney Colleen Kukowski and WDKY Pretrial Services Officer Joshua Rose kindly consent to this motion.

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Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of April, 2021, I electronically filed the foregoing Motion and proposed Order with the Clerk of Court using the CM / ECF system, which will send an electronic notification of such filing to all counsel of record.

/s/

Pat Munroe Woodward, Esq.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

CLAYTON RAY MULLINS,

Defendant.

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**Criminal No. 21-cr-00035-EGS
(Release Order 21-mj-233)**

ORDER

Upon consideration of Defendant's Consent Motion to Modify Conditions of Release, with the agreement of the Pretrial Services and United States Attorney's Offices, it is this _____ day of April, 2021,

ORDERED, that the Order Setting Conditions of Release (ECF No. 11) issued on March 2, 2021, is hereby modified to permit Defendant's travel beyond the Western District of Kentucky for employment purposes as approved by the Pretrial Services Office - Paducah Division.

All other conditions of release remain in full force and effect.

Emmet G. Sullivan
United States Judge