

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

UNITED STATES OF AMERICA,	:	
	:	
v.	:	Case No. 1:22-cr-0080-EGS
	:	
JOSHUA JOHNSON,	:	
Defendant.	:	

**MOTION FOR
MODIFICATION OF CONDITIONS OF RELEASE**

Comes now Defendant Joshua Johnson, by and through counsel, to request the entry of an Order modifying his conditions of release to vacate the condition of home detention with location monitoring. (radio frequency) Instead, Mr. Johnson proposes that the Court set a curfew restricting him to be in his home, daily, from 8:30 p.m. to 4:30 a.m..

As grounds, the following is stated:

1. It is counsel’s understanding the government opposes this motion, per AUSA Alexis Loeb.

2. On March 31, 2022, U.S. Magistrate Judge Zia M. Faruqui released Mr. Johnson on conditions including restricted home detention with location monitoring by radio frequency. *See* Doc. 19, Sec. 7(p)(ii) & (q)(iii). Trial of this matter is scheduled for July 10, 2023.

3. Counsel has communicated with USPO Morgan Petty, Mr. Johnson’s supervising pre-trial officer. She reports that Mr. Johnson is in full compliance with

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA UNITED STATES OF AMERICA, v. Case No. 1:22-cr-00080-EGS: JOSHUA JOHNSON, Defendant.: MOTION FOR MODIFICATION OF CONDITIONS OF RELEASE Comes now Defendant Joshua Johnson, by and through counsel, to request the entry of an Order modifying his conditions of release to vacate the condition of home detention with location monitoring. (radio frequency) Instead, Mr. Johnson proposes that the Court set a curfew restricting him to be in his home, daily, from 8:30 p.m. to 4:30 a.m.. As grounds, the following is stated: 1. It is counsel's understanding the government opposes this motion, per USA Alexis L. Lee, 21 On March 31, 2022, U.S. Magistrate Judge Zia M. Faruqui released Mr. Johnson on conditions including restricted home detention with location monitoring by radio frequency. See Doc. 19, Sec. 7(p)(ii) & (q)(iii). Trial of this matter is scheduled for July 10, 2023. 3. Counsel has communicated with USPO Morgan Petty, Mr. Johnson's supervising pre-trial officer. She reports that Mr. Johnson is in full compliance with -1- all of his conditions of release. 4. Mr. Johnson is requesting a modification of his conditions of release to vacate home detention with location monitoring (radio frequency) and asks the Court to instead set a curfew restricting him to be in his home daily from 8:30 p.m. to 4:30 a.m. 5. Mr. Johnson has and currently resides with his brother, Gage Johnson, who is also his employer in the construction/home renovation business. The work hours are typically 5:00 a.m. to 7:00 p.m, Monday through Friday. On Saturdays, the work day begins at approximately 5:00 a.m, and sometimes (but not always) ends in the early afternoon. The proposed curfew hours will allow Mr. Johnson to opportunity to attend to personal matters on Saturday afternoons, e.g., light shopping, haircuts, visits to a local pharmacy, etc. And, on Sundays, he would like to be able to visit his young children who reside with their mother approximately 2 hours away. 6.. Mr. Johnson understands and agrees that all other conditions of release remain in full force and effect. WHEREFORE, for the foregoing reasons and such other reasons that may appear just and proper, defendant Joshua Johnson requests the entry of an Order modifying his conditions of release to vacate the condition of home detention with location monitoring. (radio frequency) Instead, Mr. Johnson proposes that the Court set a curfew restricting him to be in his home from 8:30 p.m. to 4:30 a.m. daily. -2- Respectfully submitted, Digitally signed Allen H. by Allen H. Orenberg Orenberg Date: 2022.11.10 14:26:13 -05'00' Allen H. Orenberg, # 195519 The Orenberg Law Firm, P.O. # 2505 Pate Potomac Avenue, and 150 Potomac Maryland 20854 Tel: No. (301) 984-8005 Fax No. (301) 984-8008 Cell-phone (301)-807-3847 aorenberg@orenberglaw.com Counsel for Joshua Johnson Dated: November 10, 2022 -3-

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6.. Mr. Johnson understands and agrees that all other conditions of release remain in full force and effect.

WHEREFORE, for the foregoing reasons and such other reasons that may appear just and proper, defendant Joshua Johnson requests the entry of an Order modifying his conditions of release to vacate the condition of home detention with location monitoring. (radio frequency) Instead, Mr. Johnson proposes that the Court set a curfew restricting him to be in his home from 8:30 p.m. to 4:30 a.m. daily.

Respectfully submitted,

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Dated: November 10, 2022