

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

_____	)	
UNITED STATES OF AMERICA	)	
	)	
v.	)	Case No. 1:21-cr-118 (RCL)
	)	
LISA MARIE EISENHART	)	
_____	)	

**DEFENDANT’S MOTION FOR MODIFICATION OF BOND**

NOW COMES Defendant Lisa Marie Eisenhart, by and through undersigned appointed counsel, and with the consent of Ms. Eisenhart’s U.S. Pretrial Officer, hereby requests that her conditions of bond be modified to remove her electronic (location) monitoring and curfew.

U.S. Pretrial Officer Felicia White, who supervises Ms. Eisenhart at her current location, advises undersigned counsel that her District routinely reviews Defendants at or near their six-month point of supervision, to determine if a defendant who is in full compliance may warrant removal of certain conditions. Ms. White recommends that both the electronic monitoring and curfew condition on Ms. Eisenhart’s bond be eliminated. If this Court declines that suggestion, Ms. White recommends that a curfew alone be kept. Beyond the cost and time savings to U.S. Probation, Ms. Eisenhart would also benefit from a release that will better allow for exercise and other routine activities of daily life.

Accordingly, Ms. Eisenhart moves this Court to modify the conditions of her current bond to remove the aforementioned conditions. AUSA Leslie Goemaat was contacted today about this motion, but she has advised that the Government is not yet able, without further evaluation, to state its position on these requested changes.

Dated August 10, 2021

Respectfully submitted,

/s/ Gregory S. Smith  
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing is automatically being served upon all counsel of record, via the Electronic Case Filing system.

This 10<sup>th</sup> day of August, 2021.

/s/ Gregory S. Smith  
Gregory S. Smith