

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

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 1:21-cr-00160-002 (TJK)
)	
LOUIS ENRIQUE COLON,)	UNOPPOSED MOTION TO
)	MODIFY CONDITIONS OF
Defendant.)	PRETRIAL RELEASE

COMES NOW the defendant, Louis Enrique Colon, by and through undersigned counsel, pursuant to 18 U.S.C. § 3142 and Rule 12 of the Federal Rules of Criminal Procedure, and hereby respectfully requests this honorable court to enter an order modifying his pretrial release conditions. In support of this motion the defendant states the following suggestions in support:

SUGGESTIONS IN SUPPORT

1. The defendant is on pretrial release and under the supervision of the U.S. Probation and Pretrial Office for the Western District of Missouri.
2. Mr. Colon was placed on home detention as an additional condition of release. (See Doc. No. 43 at p. 2 ¶ (p)(ii).
3. The defendant respectfully requests the Court modify the conditions of his pretrial release by omitting the home detention requirement and adding the following condition:

(p)

(iv) **Stand Alone Monitoring.** You have no residential curfew, home detention, or home incarceration restrictions. However, you must comply with the location or travel restrictions as imposed by the court.

Note: Stand Alone Monitoring should be used in conjunction with global positioning system (GPS) technology.

4. Neither John Copes, Pretrial Services Officer in the District Court Unit, nor Senior Probation Officer Dan Schroeder in the Western District of Missouri has an objection to this request. Undersigned counsel has contacted Assistant United States Attorney Christopher Berridge, and he has no objection as to this request, based upon Pretrial Services' national policy.

5. The defendant agrees to a ruling on this motion without the requirement of a hearing unless otherwise ordered by this court.

WHEREFORE, defendant Colon respectfully requests that the Court modify the conditions of his release as set out herein and for such further and other relief as deemed appropriate by the Court.

Respectfully submitted,

WYRSCH HOBBS & MIRAKIAN, P.C.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 23rd day of June, 2021, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all counsel of record.

/s/ James R. Hobbs
Attorney for Defendant