

**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
)	TEMPORARILY MODIFY
Defendant.)	CONDITIONS OF 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 temporarily modifying his pretrial release condition 7(s) to allow him permission to travel to Washington, DC for work. 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 courtesy supervision of the U.S. Probation and Pretrial Office for the Western District of Missouri.
2. Mr. Colon’s release conditions at para. 7(s) state: Stay away from D.C. except for Court, PSA business, and to meet with Counsel. (See Doc. 43 filed February 26, 2021.) The defendant seeks to temporarily modify the condition to allow him to be in DC for work.
3. The defendant is monitored by SmartLINK. He is compliant with all conditions of his pretrial release. The most recent Pretrial Compliance Report (Doc. 165)

confirms his compliance, and he has had no reports of violation. The next Joint Status Report in Mr. Colon's case is due to the Court on August 31, 2023.

4. Mr. Colon is an electrician gainfully employed as an outside lineman on a contract basis. He is currently contracted to KR Utilities who is currently providing clean up, repair and restoration services to the east coast due to the recent storms. Mr. Colon was dispatched to Delaware. He had no prior knowledge upon arrival in Delaware that he would be asked to travel to Washington, DC; however significant storms in that area have resulted in his employer sending crews to assist. While the length of time that Mr. Colon will be in DC, he will remain in close contact with his P.O. as to when he has completed this work. Mr. Colon is currently in Delaware awaiting a ruling as to whether he can travel to DC for this purpose. If this motion is granted, he will continue to abide by all other conditions of pretrial release.

5. Undersigned counsel has contacted the Western District of Missouri who is providing courtesy supervision of Mr. Colon. P.O. Humig indicated that she does not object to the Court granting a temporary modification to Mr. Colon's release conditions allowing him to be in DC for work. She has no concerns with him continuing to abide by all other conditions. Mr. Copes with the D.C. District Court Unit Pretrial Services Office has indicated that he is not opposed to this request. Undersigned counsel has been in dialogue with Assistant United States Attorney Conor Mulroe as to the government's position with regard to this motion. AUSA Mulroe has indicated that the government has no objection to this request for temporary modification.

6. 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 temporarily modify paragraph 7(s) of his release conditions as set out herein and for such further and other relief as deemed appropriate by the Court.

Respectfully submitted,

WYRSCH HOBBS & MIRAKIAN, P.C.

By: / s/ James R. Hobbs
JAMES R. HOBBS DC Bar ID MO0022
1200 Main Street
Suite 2110
Kansas City, Missouri 64105
Tel: (816) 221-0080
Fax: (816) 221-3280
jrhobbs@whmlaw.net
ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 8th day of August, 2023, 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