

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	CASE NO. 22-CR-171-02 (JMC)
	:	
PAULA ANN CONLON,	:	
	:	
Defendant.	:	

RESPONSE TO DEFENDANT’S MOTION TO MODIFY CONDITIONS OF RELEASE

The United States of America opposes the Defendant’s motion to remove or lessen the location monitoring condition of her release. As discussed in the status hearing on August 16, 2022, Ms. Conlon, upon being asked if she possessed a weapon, told the FBI she did not have one, and that the only gun she had was a shotgun, which had been stolen. She spoke to the FBI at approximately 10:30 am. when they came to her home on May 17, 2022. Later that day, she was captured at approximately 1:25 p.m. on surveillance footage from a local medical clinic hiding a weapon under a bush. When local law enforcement responded they found an AR-15 firearm and hundreds of rounds of ammunition. The location of the weapon was within 1,000 feet of a middle school, which went into emergency lockdown until the situation was resolved.

Ms. Conlon’s actions on the day of her arrest caused great concern to the United States Probation office and thus they requested location monitoring as a condition. Ms. Conlon has a criminal history involving suspension of her driver’s license for infractions including at least one DUI; a conviction for Resisting/Interfering with Arrest in 2012 in Montgomery County, Maryland; and an arrest in St. Louis County, Missouri in 2015 for Assault on a Law Enforcement Officer. She received one year probation for the Maryland case, and the Missouri case lists no disposition.

Her poor judgment in dealing with the AR-15, along with her history of resisting and assault, as well as her prior addictive behavior pose a threat to the community should she relapse.

Therefore, the Government opposes the Defendant's requests, and respectfully requests that the condition remain in place.

Respectfully submitted,

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CERTIFICATE OF SERVICE

On this 17th day of August, 2022, a copy of the foregoing was served on counsel of record for the defendant via the Court's Electronic Filing System.

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