

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CRIM. NO. 21-00189 (CJN)

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICHARD L. HARRIS,

Defendant.

**UNOPPOSED MOTION TO MODIFY
CONDITIONS OF PRETRIAL RELEASE**

The Defendant, Richard Harris, through undersigned counsel, moves this Court to modify the conditions of his pretrial release to: 1) allow him to travel anywhere within Washington State; and 2) permit him to travel to Las Vegas, Nevada in mid-April of 2023,¹ and states that:

On May 19, 2021, this Court ordered *ore tenus* that Mr. Harris be released from custody pending resolution of the instant charges. To ensure the Defendant's appearance at future proceedings, the Court imposed several conditions of release, including home detention, GPS monitoring and maintaining employment, and further required that his father, Frederick Harris, pledge his residence as security. Because of administrative issues necessary to secure the elder Mr. Harris's property, the Court modified the latter condition and released the Defendant to his father as a

¹Travel arrangements are pending the resolution of the instant request.

third party custodian on June 2, 2021. At Mr. Harris's request, the Court later agreed to replace home detention with first a curfew and then with "Stand Alone Monitoring". Additionally, GPS monitoring has been terminated. The Defendant was also granted permission to travel to Clark County, Washington to visit his fiancée, who resides there. Since the most recent modification, Mr. Harris has continued to abide by all orders of the Court and instructions of the District of Oregon Probation Office. He has thus been under supervision for twenty-two (22) months without a single violation.

Mr. Harris is now seeking leave from the Court to travel to Las Vegas, Nevada in mid-April of this year as he intends to be wed there. Since his bride-to-be's family resides in Washington State, he would then like to be able to travel anywhere within the state to visit them and attend family outings.

Neither Assistant United States Attorney Jason Manning nor United States Probation Officer Nicholas Nischik objects to the requested relief.

WHEREFORE, the Defendant requests that: 1) he be allowed to travel anywhere within Washington State; and 2) he be permitted to travel to Las Vegas, Nevada in mid-April to be married there.

Respectfully submitted,

MICHAEL CARUSO
Federal Public Defender

s/ Eric Cohen

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on **March 22, 2023**, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day of all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

By: */s/Eric Cohen*
Eric Cohen