

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

UNITED STATES

*

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v.

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Case No. 21-cr-00160-TJK

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RYAN ASHLOCK

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**UNOPPOSED MOTION TO MODIFY
CONDITIONS OF RELEASE**

COMES NOW the Defendant, Ryan Ashlock, by and through his attorneys, Michael E. Lawlor, and Brennan, McKenna & Lawlor, Chtd., and respectfully requests that this Honorable Court modify the conditions of release in this case. In support of this motion, counsel states the following.

1. Mr. Ashlock made his initial appearance before this Court and was released on pre-trial conditions on February 26, 2021. Specifically, this Court ordered that Mr. Ashlock be placed on personal recognizance with home detention and location monitoring.

2. Since that time, Mr. Ashlock has complied with all conditions of his pre-trial release.

3. At this time, Mr. Ashlock respectfully asks this Court to modify his conditions of release specifically that he be removed from home detention and electronic monitoring. Mr. Ashlock is an electrician and often gets called for jobs on weekends and/or on short notice. Thus, in addition to the fact that Mr. Ashlock

has appeared for every court appearance and is often in contact with undersigned counsel – he is not a flight risk or a threat to his community – the continued conditions of release, such as they are now, impact his efforts at employment. Mr. Ashlock is young and in order to advance in his trade he needs to accumulate hours at the various “stages” of skill level.

4. Undersigned counsel contacted Assistant United States Attorney Christopher Veatch about the instant request. At this time undersigned counsel is authorized to state that the United States is not opposed to this request. I understand from Mr. Veatch that he consulted with pre-trial before informing me of his position.

5. For these reasons, Mr. Ashlock respectfully asks this Court to modify his conditions of release such be removed from home detention and electronic monitoring.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this day, February 8, 2022, a copy of the foregoing was sent via ECF to Assistant United States Attorney Christopher Veatch.

/s/

Michael E. Lawlor