

UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)
) **CR. NO. 21-70 (ABJ)**
)
v.)
)
SAMUEL CAMARGO)

UNOPPOSED MOTION FOR RELEASE

Samuel Camargo, through undersigned counsel, respectfully moves this Honorable Court to enter an Order releasing him from the D.C. Department of Corrections and set appropriate conditions of release until the next court hearing. The government does not oppose this motion. In support of this motion, the defense states as follows:

1. Mr. Camargo was arrested on January 20, 2021 in this case.
2. The government has extended a plea offer to one count, specifically to 40 U.S.C. § 5104(e)(2)(D), a misdemeanor, which has a maximum of six months of imprisonment.
3. Mr. Camargo will reach six months of imprisonment by July 20, 2021.
4. The parties request that Mr. Camargo be released by July 20th and that this Court set appropriate release conditions until the next court hearing, scheduled for August 17th.

Respectfully Submitted,

A.J. KRAMER
FEDERAL PUBLIC DEFENDER

 /s/
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