



recently been provided an employment opportunity with a major painting contractor in Ohio, Kaluzne Painting. Mr. Faulkner has worked for Kaluzne Paintings on multiple projects in the past. However, these particular projects will require Mr. Faulkner to travel to and work in the Northern District of Ohio. Furthermore, the project will also require Mr. Faulkner to temporarily reside outside of the Northern District of Ohio during these projects in a residence provided by Kaluzne Painting. This employment is expected to begin starting April 21, 2021.<sup>1</sup>

3. Undersigned counsel has spoken to Mr. Faulkner's Pretrial Services officer in Columbus, Ohio, Tania Turner. Ms. Turner has confirmed Mr. Faulkner's employment opportunity with Kaluzne Painting with its owner, Joe Kaluzne. Ms. Turner also indicated that her office is able to continue supervision should Mr. Faulkner work and/or temporarily reside in the Northern District of Ohio.

4. Mr. Faulkner respectfully requests that his release conditions be expanded to permit employment, travel, and temporary residence to the Northern District of Ohio. Since the state of Ohio is divided into two federal districts, the

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<sup>1</sup> The employment also requires him to work overnight hours, as the projects are of commercial properties that are open to the public during normal business hours. However, the release order currently permits curfew adjustments with verified employment by Pretrial Services, so no modification is needed in that regard.

Northern District of Ohio and the Southern District of Ohio, an order restricting him to the state of Ohio would suffice.

5. Undersigned counsel has spoken to AUSA Emory Cole, who indicates that he does not oppose this motion.

WHEREFORE, for the reasons and arguments made above, Defendant Troy Elbert Faulkner prays that the court modify release conditions to permit him to amend his release conditions so that Mr. Faulkner may work, travel, and temporarily reside in the Northern District of Ohio.

Respectfully submitted,

TROY ELBERT FAULKNER  
By Counsel

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**Certificate of Service**

I hereby certify that a true copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system this 16th day of April, 2021, which will send a notification of such filing (NEF) to the following to all counsel of record.

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