

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

UNITED STATES OF AMERICA

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:

Criminal No. 1:21-MJ-00148 (ZMF-1)

:

JASON GERDING

:

**UNOPPOSED MOTION TO MODIFY
CONDITIONS OF RELEASE**

Jason Gerding, through counsel, respectfully requests that his conditions of release be modified, specifically the travel restrictions that are in place. In support of this Motion, counsel states the following facts.

1. Mr. Gerding is charged by complaint with Knowingly Entering or Remaining in any Restricted Building or Grounds; Knowingly Engaging in Disorderly Conduct in any Restricted Building or Grounds; and Violent Entry and Disorderly Conduct on Capitol Grounds.
2. Mr. Gerding was released on his personal recognizance on February 2, 2021.
3. Mr. Gerding is currently ordered to inform his Pretrial Services Agency officer if he leaves the state of Illinois. However, Mr. Gerding lives within a mile from the Illinois and Missouri border. He frequently crosses the border for day to day errands. Mr. Gerding also frequently travels around the state when he works.
4. Pretrial Services Agency has recommended that the travel conditions be modified to a radius from his home, given Mr. Gerding's proximity to the border. Pretrial Services has

recommended a 50 mile radius. However, Mr. Gerding reports that he often works up to 100 miles away from his house.

5. There is nothing about Mr. Gerding's charges that requires him to stay within a 50 mile radius of his home. Although even a 100 mile radius is not the "least restrictive condition" to reasonably assure the safety of the community, Mr. Gerding has consented to some travel restrictions. But given the location of his home and the nature of his work, he requests that the restriction be modified to require him to report to Pretrial Services by phone if he travels outside of 100 miles from his home.
6. The government does not oppose this Motion .

Conclusion

Wherefore, for the foregoing reasons, Mr. Gerding respectfully requests that the Court modify his conditions of release so that he is required to report by phone to Pretrial Services Agency if he goes farther than 100 miles from his home.

Respectfully submitted,

A. J. KRAMER
FEDERAL PUBLIC DEFENDER

/s/

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ORDER

Upon consideration of the Defendant's Unopposed Motion to Modify Conditions of Release, it is hereby ORDERED that the Defendant's motion is GRANTED and that the current travel restriction is vacated. It is further ORDERED that the Defendant is required to notify the Pretrial Services Agency by telephone if he travels farther than 100 miles from his house. All other release conditions ordered on February 2, 2021 are to remain.

Date: _____

JUDGE ZIA FARUQUI
UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF COLUMBIA