

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-CR-46-RDM
	:	
PATRICK MONTGOMERY,	:	
	:	
Defendant.	:	

**UNOPPOSED MOTION TO ADJUST THE STATUS OF  
MR. MONTGOMERY'S PRE-TRIAL RELEASE  
TO PERMIT HIM TO WORK**

This Firm is counsel to defendant Patrick Montgomery and hereby submits this unopposed motion respectfully asking the Court to reconsider the conditions of his pre-trial release to permit Mr. Montgomery to leave his home confinement for the purpose of lawful employment (excluding any employment that would require a weapon) so that he may continue to support himself and his family through the pendency of any trial in the case. We have conferred with the government, which does not oppose this request.

On May 12, 2021, the United States filed a motion to revoke Mr. Montgomery's pre-trial release based on a hunting incident in Colorado in which Mr. Montgomery allegedly shot a mountain lion in Denver, Colorado, despite having previously been convicted of a felony offense in New Mexico in 2011. After a hearing, the Court granted the government's motion but encouraged the parties to discuss a potential alternative to incarceration. The government and Mr. Montgomery's prior counsel reached an agreement that would impose pre-trial conditions of release, including: (1) home incarceration; (2) GPS monitoring; (3) firearms and hunting prohibitions; as well as other conditions. (ECF Docket No. 33 at 2).

Given the posture of the case, a trial in this case could be months, if not a year or more away. Mr. Montgomery is a professional hunting guide by profession and, on home confinement, he has no ability to support himself during the coming months. The government has agreed that the ends of justice would be served if Mr. Montgomery were permitted to leave his home, while still being monitored by an ankle bracelet, for the purpose of employment, which employment will not involve a weapon. If this unopposed motion is granted, it would give Mr. Montgomery the ability to get a job and support himself during the pendency of this case.

The Court's consideration of this request is greatly appreciated.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Duncan Levin", followed by a horizontal line.

Duncan Levin, Esq. (*pro hac vice*)  
Levin & Associates, PLLC  
44 Court Street, Suite 905  
Brooklyn, New York 11215  
(212) 330-7626  
*Counsel for Patrick Montgomery*