

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

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 1:21-cr-00160-002 (TJK)
)	
LOUIS ENRIQUE COLON,)	UNOPPOSED MOTION TO
)	MODIFY CONDITIONS OF
Defendant.)	PRETRIAL RELEASE

COMES NOW the defendant, Louis Enrique Colon, by and through undersigned counsel, pursuant to 18 U.S.C. § 3142 and Rule 12 of the Federal Rules of Criminal Procedure, and hereby respectfully requests this honorable court to enter an order modifying his pretrial release conditions by suspending the requirement that he be subject to Stand Alone Monitoring. The defendant is not requesting that GPS monitoring be suspended. In support of this motion the defendant states the following suggestions in support:

SUGGESTIONS IN SUPPORT

1. The defendant is on pretrial release and under the supervision of the U.S. Probation and Pretrial Office for the Western District of Missouri.
2. Mr. Colon's release conditions were modified in open court on June 24, 2021, eliminating the home detention requirement and replacing it with Stand Alone Monitoring to be used in conjunction with GPS technology. (See Minute Entry dated June 24, 2021.)
3. The defendant's Stand Alone Monitoring is achieved by way of ankle bracelet. Mr. Colon is an electrician gainfully employed as an outside lineman. As the fall and winter

months are fast approaching, Mr. Colon will be required to wear appropriate approved work boots to comply with union and employer rules. These boots will simply not comfortably allow for the Stand Alone Monitoring ankle device. Mr. Colon respectfully requests the Court modify the conditions of his pretrial release by suspending the Stand Alone monitoring requirement and allowing him to continue on release with GPS monitoring only.

4. Mr. Colon has been compliant with all conditions of his pretrial release. (See Pretrial Compliance Report Doc. No. 104.) He will continue to abide by all other conditions of pretrial release.

5. Undersigned counsel has contacted the Western District of Missouri who is providing courtesy supervision of Mr. Colon. P.O. Humig indicated that she recommends eliminating the ankle bracelet altogether as Mr. Colon is very compliant, and she has no concerns with him continuing to abide by all other conditions. She further indicated that she recommends phone GPS monitoring. Mr. Copes with the D.C. District Court Unit Pretrial Services Office has indicated that he is not opposed to a modification but will defer to the Court as to what type of modification is appropriate. Undersigned counsel has been in dialogue with Assistant United States Attorney Christopher Berridge as to the government's position with regard to this motion. AUSA Berridge has indicated that the government has no objection to this request so long as the defendant continues to be monitored by GPS technology.

6. The defendant agrees to a ruling on this motion without the requirement of a hearing unless otherwise ordered by this court.

WHEREFORE, defendant Colon respectfully requests that the Court modify the conditions of his release as set out herein and for such further and other relief as deemed appropriate by the Court.

Respectfully submitted,

WYRSCH HOBBS & MIRAKIAN, P.C.

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 30th day of September, 2021, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all counsel of record.

/s/ James R. Hobbs
Attorney for Defendant