

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

UNITED STATES OF AMERICA,)	
)	
)	
)	
v.)	Case No. 1:21-cr-160-TJK
)	
CORY KONOLD, et al.,)	
)	
Defendants.)	

**DEFENDANT CORY KONOLD’S UNOPPOSED MOTION TO MODIFY CONDITIONS
OF PRETRIAL RELEASE**

Defendant Cory Konold, through counsel, moves the Court to modify the conditions of his pretrial release by lifting the requirement that he wear a GPS electronic monitoring ankle bracelet at all times. Release Order, ECF No. 38, § 7(q). The government and Pretrial Services Office do not oppose the relief sought by this motion.

Konold has been in compliance with his conditions of pretrial release for the past eleven months. ECF No. 127. He is currently employed as a line installer by Cox Communications. The requirement that he wear an electronic monitoring ankle bracelet has interfered with his ability to earn income sufficient to support himself. With the bracelet on, his employer has limited Konold to what is known as yard work. In this role Konold earns significantly less than he would in the field. He is struggling to pay for groceries and other necessities. However, his employer has indicated that if Konold’s ankle bracelet were removed, he could again work in the field at a higher hourly rate of pay.

The government has advised that it does not oppose removal of the bracelet and termination of Konold’s current 9 p.m. to 6 a.m. curfew. Counsel inquired with Konold’s Pretrial Services Officer, Manny Calderon, whether he would oppose this relief. Officer

Calderon said that Konold has been in compliance with his conditions of release and would not oppose the proposed relief. Christine Schuck, Pretrial Services Officer in this district, indicated the same.

Konold therefore requests that the Court lift the requirement that he be subject to the location monitoring program, so that he may pursue gainful employment.

Dated: January 5, 2022

Respectfully submitted,

/s/ Nicholas D. Smith
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Certificate of Service

I hereby certify that on the 5th day of January, 2022, I filed the foregoing motion with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following CM/ECF user(s):

Christopher K. Veatch
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And I hereby certify that I have mailed the document by United States mail, first class postage prepaid, to the following non-CM/ECF participant(s), addressed as follows: [none].

/s/ Nicholas D. Smith