

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

|                                 |   |                                     |
|---------------------------------|---|-------------------------------------|
| <b>UNITED STATES OF AMERICA</b> | ) |                                     |
|                                 | ) | <b>Criminal No. 21-204-01 (BAH)</b> |
| <b>v.</b>                       | ) | <b>Chief Judge Howell</b>           |
|                                 | ) | <b>Status: January 21, 2022</b>     |
| <b>MATTHEW BLEDSOE</b>          | ) |                                     |

**UNOPPOSED  
MOTION TO TEMPORARILY MODIFY CONDITIONS OF RELEASE  
TO PERMIT SPECIAL WORK TRAVEL  
AND POINTS AND AUTHORITY IN SUPPORT THEREOF**

COMES NOW the defendant, Matthew Bledsoe, by and through undersigned counsel, and respectfully moves this Honorable Court to temporarily modify his conditions of release in this case to permit him to travel to West Plains, Missouri on Tuesday, December 21, 2021 for work purposes. In support of this motion, Mr. Bledsoe would show:

1. As has been discussed at earlier hearings and verified by the Pretrial Services Agency (PSA), Mr. Bledsoe owns a moving company in Memphis, Tennessee. Most of Mr. Bledsoe's business is for moves that occur within the Memphis area. However, on occasion, Mr. Bledsoe does do moves that are outside the area.

2. Currently, as a condition of his release in this case, Mr. Bledsoe is restricted to travel within a 150-mile radius of Memphis, Tennessee without first notifying the Pretrial Services Agency. Additionally, Mr. Bledsoe is on GPS location monitoring with a 10:00 p.m. to 6:00 a.m. curfew.

3. Mr. Bledsoe currently has an opportunity to do a moving job on Tuesday, December 21, 2021 to West Plains, Missouri. West Plains, Missouri is approximately 175 miles

from Memphis. For Mr. Bledsoe to do the move, he will need to leave Memphis early in the morning on Tuesday, December 21, 2021 and return to Memphis late that same day. This will likely impact his current curfew restrictions.

4. On December 19, 2021, undersigned counsel exchanged e-mails with Assistant United States Attorney Mitra Jafary-Hariri. Ms. Jafary-Hariri graciously indicated that the government does not oppose this motion by Mr. Bledsoe to temporarily modify his conditions of release in this case to permit him to travel for work purposes to West Plains, Missouri on Tuesday, December 21, 2021.

5. Conditions of release can be modified by a judicial officer at any time. 18 U.S.C. § 3142(c)(3).

WHEREFORE, the defendant, Matthew Bledsoe, moves this Honorable Court to temporarily modify his conditions of release in this case to permit him to travel for work purposes to West Plains, Missouri on Tuesday, December 21, 2021.

Respectfully submitted,

/s/

Jerry Ray Smith, Jr.  
D.C. Bar No. 448699  
Counsel for Matthew Bledsoe  
717 D Street, N.W.  
Suite 310  
Washington, DC 20004  
E-mail: [jerryraysmith@verizon.net](mailto:jerryraysmith@verizon.net)  
Phone: (202) 347-6101