

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

UNITED STATES OF AMERICA)	
)	Criminal No. 21-204-01 (BAH)
v.)	Chief Judge Howell
)	
MATTHEW BLEDSOE)	

**UNOPPOSED MOTION
TO MODIFY CONDITIONS OF PRETRIAL RELEASE
TO ACCOMMODATE DEFENDANT’S PLANNED MOVE
OF HIS RESIDENCE FROM MEMPHIS, TENNESSEE
TO NEARBY OLIVE BRANCH, MISSISSIPPI
AND POINTS AND AUTHORITY IN SUPPORT THEREOF**

COMES NOW the defendant, Matthew Bledsoe, by and through undersigned counsel, and respectfully requests that this Honorable Court permit him to move his residence from Memphis, Tennessee to nearby Olive Branch, Mississippi and that the Court modify his conditions of pretrial release in this case to accommodate this move. In support of this motion, Mr. Bledsoe would show:

1. Mr. Bledsoe currently resides in Memphis, Tennessee. As a condition of his pretrial release in this case, Mr. Bledsoe is to submit to courtesy supervision by the Pretrial Services Agency (PSA) in the Western District of Tennessee. Also, he is on electronic monitoring with a curfew that requires him to be in his home from 10:00 p.m. to 5:00 a.m. He is not to travel outside a 150-mile radius of Memphis without first notifying PSA in the Western District of Tennessee.

2. Mr. Bledsoe is planning on moving his residence from Memphis, Tennessee to Olive Branch, Mississippi. Olive Branch is part of the greater Memphis area. However, it is in

the state of Mississippi. Mr. Bledsoe is planning on moving his residence from Memphis to Olive Branch on March 7 to March 9, 2022.

3. On February 23, 2022, undersigned counsel spoke with Mr. Bledsoe's PSA worker here in D.C., Christine Schuck. Ms. Schuck informed counsel that PSA is aware of Mr. Bledsoe's planned move to Olive Branch, Mississippi. Ms. Schuck also informed counsel that, with Mr. Bledsoe's move to Olive Branch, courtesy supervision of his pretrial release will need to be transferred from PSA in the Western District of Tennessee to PSA in the Northern District of Mississippi. Ms. Schuck indicated that it appears that PSA in the Northern District of Mississippi will be able to accept courtesy supervision of Mr. Bledsoe's pretrial release. However, Ms. Schuck informed counsel that, in order for her office to formally request that PSA in the Northern District of Mississippi accept that courtesy supervision, an appropriate order from the Court is needed.

4. Mr. Bledsoe now requests that the Court allow him to move his residence from Memphis, Tennessee to Olive Branch, Mississippi. Accordingly, Mr. Bledsoe requests that the Court modify his conditions of release in this case to now include the provision that courtesy supervision of his release in this case be done by PSA in the Northern District of Mississippi upon his move to Olive Branch. Also, he requests that his conditions of release be modified to now indicate that, when he moves to Olive Branch, he will report to PSA in the Northern District of Mississippi for supervision and submit to that supervision going forward. Finally, he requests that his conditions of release be modified to now indicate that, once he relocates to Olive Branch, he will not travel outside a 150-mile radius of Olive Branch without first notifying PSA in the Northern District of Mississippi of such travel.

5. On February 25, 2022, undersigned counsel exchanged e-mail messages with Assistant United States Attorney Mitra Jafary-Hariri. Counsel explained to Ms. Jafary-Hariri the

substance and purpose of this motion. Ms. Jafary-Hariri graciously indicated that the government does not oppose this motion.

6. 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, requests that this Honorable Court permit him to move his residence from Memphis, Tennessee to nearby Olive Branch, Mississippi and that the Court modify his conditions of pretrial release in this case to accommodate this move.

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
Phone: (202) 347-6101