UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)(
)(Criminal No. 21-204-01 (BAH)
v.)(Chief Judge Howell
)(Trial: July 18, 2022
MATTHEW BLEDSOE)(

UNOPPOSED MOTION TO TEMPORARILY MODIFY CONDITIONS OF RELEASE TO PERMIT SPECIAL 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 Branson, Missouri from Monday, June 13 through Friday June 17, 2022. In support of this motion, Mr. Bledsoe would show:

- 1. Currently, as a condition of his release in this case, Mr. Bledsoe is restricted to travel within a 150-mile radius of Olive Branch, Mississippi without first notifying the Pretrial Services Agency. Additionally, Mr. Bledsoe is also on GPS location monitoring with a 10:00 p.m. to 6:00 a.m. curfew.
- 2. Mr. Bledsoe would like to take his daughters to Branson, Missouri for a short family vacation from Monday, June 13 to Friday, June 17, 2022. Mr. Bledsoe plans to leave Olive Branch, Mississippi in the morning on June 13 and arrive in Branson, Missouri that same day. He plans to stay in the Branson area until Friday, June 17. On June 17, he will return to Olive Branch.

- 3. Over the course of June 7 and June 8, 2022, undersigned counsel exchanged e-mails with Assistant United States Attorneys Jamie Carter regarding Mr. Bledsoe's upcoming travel plans. Ms. Carter graciously indicated that the government does not oppose a motion by Mr. Bledsoe to temporarily modify his conditions of release in this case to permit him to travel to Branson, Missouri from Monday, June 13 through Friday, June 17, 2022.
- 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 to permit him to travel to Branson, Missouri from Monday, June 13 through Friday, June 17, 2022.

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