

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,)	
)	
v.)	No. 21-091 (RCL)
)	
ISAAC STEVE STURGEON,)	
)	
Defendant.)	
_____)	

UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE

Defendant, Isaac Sturgeon, through counsel, respectfully requests that the Court modify the conditions of release currently in place, requiring Location monitoring with Radio Frequency (RF) technology. Below are the reasons in support:

- (1) Mr. Sturgeon was indicted on February 5, 2021 for one count of Obstruction of an Official Proceeding and Aiding and Abetting in violation of 18 U.S.C. §1512(c)(2) and (2), one count of Assaulting, Resisting, or Impeding Certain Officers in violation of 18 U.S.C. §111(a)(1), one count of Civil Disorder in violation of 18 U.S.C. §231(a)(3), one three counts of 18 U.S.C. §1752(a)(1)(2), and (4), and one count of 40 U.S.C. §5104(e)(2)(E) . *See* ECF Dkt. No. 3.
- (2) Mr. Sturgeon was arrested on March 6, 2021 at the John F. Kennedy Airport in Queens, New York. *See* ECF Dkt. No. 14.
- (3) He was released by the Court in the Eastern District of New York on March 8, 2021 with conditions that included: (1) location monitoring, (2) curfew, and (3) a 250,000 bond. *See* ECF Dkt. No. 20. He was ordered to appear in Montana, his place of residence, for continued supervision. *Id.*

- (4) Mr. Sturgeon appeared before the Honorable Magistrate Judge Zia M. Faruqui on March 15, 2021 and was also ordered released on conditions including location monitoring. *See* ECF Dkt. No. 24. The Court further ordered that he comply with courtesy supervision in the District of Montana/Helena and that he surrender any passports to Pretrial Services. *Id.*
- (5) On May 7, 2021, the government filed a Superseding Indictment adding an additional count of 40 U.S.C. §5104(e)(2)(F). *See* ECF Dkt. No. 34.
- (6) Since March 6, 2021, Mr. Sturgeon has been in compliance with all conditions of release and has appeared for all of his court proceedings.
- (7) Mr. Sturgeon has been paying for the costs of his RF monitoring, which costs him about \$110 per month. Since March, he has paid approximately \$600 to comply with this condition. Although Mr. Sturgeon is more than agreeable to abide by any conditions of release, this has proven to create a financial burden for him.
- (8) Undersigned counsel discussed this request with his pre-trial officer in Montana, who advised he does not oppose that this condition be lifted. Undersigned counsel has also discussed this with government counsel who also spoke with DC pre-trial services. Both do not oppose the lifting of this condition.
- (9) Mr. Sturgeon no longer has access to his passport, must notify pre-trial services regarding any travel, and has been compliant with his conditions of release for the last several months. He has shown that he is not a risk of non-appearance and will continue to abide by his pre-trial release conditions.

Conclusion

For these reasons, Mr. Sturgeon respectfully requests that the Court grant this motion to modify conditions of release by removing the condition that he be subject to location monitoring.

Respectfully submitted,

A. J. KRAMER
FEDERAL PUBLIC DEFENDER

/s/

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