

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CRIM. NO. 21-00189 (CJN)

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICHARD L. HARRIS,

Defendant.

_____ /

**UNOPPOSED MOTION TO MODIFY
CONDITIONS OF PRETRIAL RELEASE**

The Defendant, Richard Harris, through undersigned counsel, moves this Court to modify the conditions of his pretrial release to: 1) eliminate the GPS monitoring and third party custodian requirements; and 2) permit him to travel to Newport, Oregon between November 4, 2022 and November 7, 2022, inclusive, and states that:

On May 19, 2021, this Court ordered *ore tenus* that Mr. Harris be released from custody pending resolution of the instant charges. To ensure the Defendant's appearance at future proceedings, the Court imposed several conditions of release, including home detention, GPS monitoring, maintaining employment, and that his father, Frederick Harris, pledge his residence as security. Because of administrative issues necessary to secure the elder Mr. Harris's property, the Court modified the latter condition and released the Defendant to his father as a third party custodian on June 2, 2021. At Mr. Harris's request, the Court later agreed to replace home

detention with first a curfew and then with “Stand Alone Monitoring”. The Defendant was also granted permission to travel to Clark County, Washington to visit his fiancée, who resides there.

Since the most recent modification, Mr. Harris has continued to abide by all orders of the Court and instructions of the District of Oregon Probation Office. He has thus been under supervision for twenty (20) months without a single violation. In recognition of the Defendant’s exemplary behavior, he is asking that the Court again modify the conditions of release to eliminate the GPS monitoring and thirty party custodian requirements.¹ He further asks for leave to travel to Newport, Oregon, between November 4, 2022 and November 7, 2022, inclusive, to celebrate his fiancée’s son’s birthday.

Neither Assistant United States Attorney Jason Manning nor United States Probation Officer Nicholas Nischik objects to the requested relief.

¹ Mr. Harris will continue to reside with his father.

WHEREFORE, the Defendant requests that: 1) the GPS monitoring and third party custodian conditions of release be eliminated; and 2) he be permitted to travel to Newport, Oregon between November 4, 2022 and November 7, 2022, inclusive.

Respectfully submitted,

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s/ Eric Cohen
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on **October 14, 2022**, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day of all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

s/Eric M. Cohen
Eric Cohen