

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

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 1:21-cr-00116
)	
WILLIAM MCCALL CALHOUN, JR)	
<i>Defendant.</i>)	

MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE

COMES NOW, Defendant, William McCall Calhoun, Jr., by and through his undersigned counsel, Jessica N. Sherman-Stoltz, Esq., and respectfully requests that this Honorable Court modify its March 23, 2021 Order Setting Conditions of Release (ECF Document #23), by removing the home detention condition and imposing a curfew between the hours of 10:00 P.M. to 6:00 A.M. In support, he states as follows:

1. Mr. Calhoun's former probation officer, Mr. Simmons, facilitated Mr. Calhoun's ability to go from various court appearances in different jurisdictions, to meetings with clients, to his former office for necessary files and supplies, without having to call Mr. Simmons with every location change he made during his work day. Additionally, sometimes Mr. Calhoun's client meetings would run past 7:00 P.M. and Mr. Simmons was understanding of this.
2. Recently, Mr. Calhoun was assigned to a new probation officer, Mr. Santucci,

who has advised him that to continue the aforementioned privileges, he would need his Order Setting Conditions of Release modified to allow a curfew location restriction program, instead of the currently ordered home incarceration location restriction program.

3. This request came shortly around the time that Mr. Calhoun's co-defendant's pretrial conditions of release were modified to remove the home detention condition and impose a curfew. *See* ECF Document – Minute Order from May 4, 2021.
4. Undersigned counsel has communicated this request to Assistant U.S. Attorney Adam Alexander.
5. Undersigned counsel has communicated this request to U.S. District Court Pretrial Officer Masharia Holman, and she does not object to the requested modification.
6. Defendant has been compliant while under pretrial supervision.

WHEREFORE, for the foregoing reasons, it is respectfully requested that the Court grant Defendant's Motion to Modify Conditions of Pretrial Release, enter an order imposing a curfew between the hours of 10:00 P.M. to 6:00 A.M., and that this Motion be heard during, or before, the next scheduled hearing in his case of July 8, 2021, at 1:00 P.M.

Dated: June 23, 2021

Respectfully Submitted,
WILLIAM MCCALL CALHOUN, JR.

/s/ Jessica N. Sherman-Stoltz
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CERTIFICATE OF SERVICE

I hereby CERTIFY that on this the 23rd day of June 2021, a true and correct copy of the foregoing Defendant's Unopposed Motion to Modify Conditions of Pretrial Release with the Clerk of Court via the CM/ECF system, which will automatically send an email notification of such filing to all counsel of record.

/s/ Jessica N. Sherman-Stoltz
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ORDER MODIFYING CONDITIONS OF PRETRIAL RELEASE

Upon consideration of the Motion to Modify Condition of Pretrial Release filed by Defendant, William McCall Calhoun, good cause having been shown, it is this _____ day of _____, 2021, by the United States District Court for the District of Columbia, **ORDERED:**

1. That the conditions of Defendant's pretrial release are hereby **MODIFIED** to remove the home detention condition of this Court's previous March 23, 2021 order, and impose a curfew between the hours of 10:00 P.M. to 6:00 A.M.
2. All other release conditions outlined in the March 23, 2021 order setting conditions of release shall remain in full force and effect.

The Honorable Dabney L. Friedrich
United States District Judge