

**UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

Case No. 1:21-cr-207 (TNM)

MATTHEW COUNCIL

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UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE

NOW COMES Matthew Council, by and through undersigned counsel, and moves this Court to modify his conditions of pretrial release to permit his assigned Pretrial Services Officer to temporarily remove and then replace his GPS monitor as needed to allow for certain medical evaluations.

STATEMENT OF POINTS AND AUTHORITIES

Mr. Council was charged by indictment on March 10, 2021, and then by superseding indictment on December 1, 2021. The alleged offenses relate to the events of January 6, 2021, at the U.S. Capitol building. Following Mr. Council's arrest, this Court released him under certain conditions, including a condition that he undergo location monitoring. Under that condition, Mr. Council is required to wear at all times a GPS ankle monitor.

Mr. Council suffers from back pain, and his doctor has recently ordered an MRI. However, that procedure cannot occur with the ankle monitor in place. Counsel has conferred with Mr. Council's assigned Pretrial Services Officer, who

suggests a blanket order granting her authority to remove and then replace the ankle monitor as needed, so that the Court need not intervene every time Mr. Council has another medical procedure requiring the temporary removal of the monitor.

Accordingly, this Court should modify Mr. Council's conditions of release to permit the Pretrial Services Officer to temporarily remove and then replace the GPS monitor as needed for medical treatment.

The Government does not oppose the relief requested by this motion.

WHEREFORE, Mr. Council prays this Court will modify his conditions of pretrial release to permit the Pretrial Services Officer to temporarily remove and then replace his GPS monitor as needed for medical evaluations.

DATED this 13th day of May 2022.

Respectfully submitted,

A. FITZGERALD HALL, ESQ.
FEDERAL DEFENDER

/s/ Samuel E. Landes

Samuel E. Landes, Esq.
D.C. Bar No. 1552625
Assistant Federal Defender
400 North Tampa Street
Suite 2700
Tampa, Florida 33602
Telephone: (813) 228-2715
Facsimile: (813) 228-2562
Email: Samuel_Landes@fd.org

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 13th of May 2022, a true and correct copy of the foregoing was filed with the Clerk of the Court using the CM/ECF system, which will send a notice of the electronic filing to:

AUSA Sean Murphy.

/s Samuel E. Landes

Samuel E. Landes, Esq.
Assistant Federal Defender