

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

**UNITED STATES**

**v.**

**MATTHEW RYAN MILLER,**

*Defendant.*

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**Crim. No. 21-CR-0075(RDM)**

**DEFENDANT’S MOTION FOR MODIFICATION  
OF RELEASE CONDITIONS**

Defendant Matthew Ryan Miller (“Miller”), by and through undersigned counsel, hereby moves this Honorable Court, pursuant to 18 U.S.C. § 3142, to modify conditions of release. As grounds for this motion Mr. Miller states as follows:

**BACKGROUND**

1. On February 19, 2021, the Court ordered Mr. Miller released to the High Intensity Supervision Program under conditions to include electronic monitoring and home detention.

2. Mr. Miller has been compliant with all conditions of release for the past ten months and has not incurred any violations.

3. Pursuant to 18 U.S.C. § 3142, the Court shall order the pretrial release of a person subject to the least restrictive conditions or combination of conditions that will reasonably assure the appearance of the person or the safety of the community.

4. Considering that he has been in complete compliance with all release conditions for the past ten months and has demonstrated his ability to comply with the Court’s

conditions, Mr. Miller respectfully requests that he be released under conditions of general supervision.

5. Matthew Ryan Miller is twenty-two years old and has no criminal record. Mr. Miller has lived in the same home in Howard County, Maryland with his mother for the past 19 years. While living with his mother, he assists in caring for his elderly grandmother and contributes financially for household expenses. Mr. Miller graduated from Glenelg High School and completed 2 years of study at Howard Country Community College. He worked for two years at Glenelg Construction before being let go due to his conduct at issue here. He has obtained new employment since his release and continues to live with his mother and grandmother.

**WHEREFORE** for the foregoing reasons and any others that may appear to the Court, Mr. Miller respectfully requests that Motion be GRANTED.

**Dated:** Washington, DC  
December 21, 2021

**BALAREZO LAW**

/s/

By:

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*Counsel for Defendant Matthew Miller*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 21<sup>st</sup> day of December 2021, I caused a true and correct copy of the foregoing Defendant's Motion for Modification of Release Conditions to be delivered to the parties in this matter via Electronic Case Filing (ECF).

/s/

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A. Eduardo Balarezo