

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

UNITED STATES OF AMERICA

*

vs.

* **Case No.: 21-CR-00213 (RJL)**

CHAD BARRETT JONES

*

Defendant

*

CONSENT MOTION TO MODIFY CONDITIONS OF RELEASE

Defendant, Chad B. Jones, by and through his attorneys, William C. Brennan, Jr., Michael E. Lawlor and Brennan, McKenna & Lawlor, Chtd., respectfully moves this Honorable Court to modify the Order Setting Conditions of Release (remove travel restriction and location monitoring) for the following reasons:

1. Defendant Jones is a resident of the W.D. of Kentucky and charged with certain offenses in the U.S. District Court for the District of Columbia. He was released pretrial with conditions on January 28, 2021 (ECF # 8.).

2. Upon his release defendant Jones returned to his home in Kentucky to be monitored by the U.S. Pretrial Services Agency in the W.D. of Kentucky. Among the special conditions of release, defendant Jones was placed on a travel restriction (travel only within the W.D. and E.D. of Kentucky) and location monitoring. The location monitoring program requires that defendant Jones respond four times a day - within seven minutes (with a facial recognition photo) - to a randomly timed cell phone call from the monitoring program.

3. Defendant Jones has been fully compliant with all of his release conditions including surrendering his passport to the U.S. Pretrial Services Agency, not possessing any weapons, and not using any social media applications and encrypted text messaging applications. He has been

on pretrial release for 20 months and has not incurred any infractions during that period of time.

4. Defendant Jones and his wife own and operate several businesses in the Commonwealth of Kentucky which requires them to travel to remote rural locations with spotty or nonexistent cell phone service. This has made it very difficult for defendant Jones to timely respond to the cell phone checks from the location monitoring program. In addition, his wife's elderly parents reside in Florida and defendant Jones and his wife may need to travel to Florida to check on her parents.

5. Accordingly, defendant Jones requests that the travel restriction and location monitoring be removed from his conditions of release.

6. Defendant Jones' Pretrial Services Officer, Todd Mousty in the W.D. of Kentucky, has advised counsel via an email that he does not object to this request. (Mousty email of October 4, 2022, attached.)

7. Government counsel, Assistant U.S. Attorney, Stephen J. Rancourt, given the position of Pretrial Services Officer Mousty as stated above, has no objection to this request.

WHEREFORE, the parties respectfully pray that:

- A. This consent motion be granted;
- B. The travel restriction (travel only within the W.D. and E.D. of Kentucky) and location monitoring be removed as special conditions; and
- C. All other conditions of pretrial release remain in full force and effect.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed electronically on October 6, 2022 and thus served upon all parties of record.

/s/
William C. Brennan, Jr.