

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

UNITED STATES OF AMERICA,

-v-

CHRISTOPHER MICHAEL ALBERTS,

Defendant.

Criminal No. 21-CR-026 (CRC)

**DEFENDANT'S EMERGENCY UNOPPOSED MOTION FOR TEMPORARY
MODIFICATION OF PRETRIAL RELEASE CONDITIONS**

Request for Temporary Removal of GPS Monitoring Device for Medical Procedure

Comes now, Defendant, CHRISTOPHER MICHAEL ALBERTS, (hereinafter, "Defendant" or "Alberts"), by and through undersigned counsel, hereby respectfully moves this Court for an Order temporarily modifying Mr. Alberts pretrial release conditions to permit removal of his electronic monitoring device on January 6, 2022, in order to permit him to undergo MRIs. Alberts has complied with the conditions of his release, which justifies the removal of the condition that he wears a GPS monitor, at least temporarily.

FACTS AND PROCEDURAL HISTORY

United States Magistrate Judge G. Michael Harvey released the Defendant on conditions, including that he stays away from the District of Columbia and, relevant to Defendant's motion, be monitored by a GPS device. (Minute Entry, Order Setting Conditions of Release, Jan. 7, 2021). The Court did not impose a curfew or otherwise restrict him to his residence. (Id.) Since that time, the grand jury has indicted him for other offenses. Consequently, he has remained on pretrial release, subject to the GPS monitoring requirement imposed by the Court in January 2021. (Government's Opposition to Motion, ECF No. 44 p. 6.)

ARGUMENT

The Defendant has presented new information that merits a change in the terms of his release. As such, pursuant to the Defendant's upcoming medical procedure, this court may modify conditions of pretrial release pursuant to 18 USC 3145(b) upon the motion of either party. The modification may be temporary as requested herein.

Wherefore, Alberts respectfully requests that this Court temporarily modify his conditions of pretrial release as set forth herein.

Dated: December 20, 2022

Respectfully submitted,

/s/ John M. Pierce
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CERTIFICATE OF SERVICE

I hereby certify that, on **December 20th, 2022**, this motion and the accompany declaration was filed via the Court's electronic filing system, which constitutes service upon all counsel of record.

/s/ John M. Pierce _____

John M. Pierce