

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

UNITED STATES OF AMERICA

v.

PAUL C. RAE,

Defendant.

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)
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Case No. 21-cr-0378

DEFENDANT PAUL RAE'S MOTION TO MODIFY CONDITIONS OF RELEASE

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Attorney for Defendant

UNITED STATES DISTRICT
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)	
v.)	Case No. 21-cr-0378
)	
PAUL C. RAE,)	
)	
Defendant.)	

NOW comes Defendant, Paul C. Rae, by and through his counsel of record, John M. Pierce, Esq., respectfully requesting this Honorable Court to modify his current conditions of release.

I. Removal of Ankle Monitor

In support of this Motion, the Defendant would like the Court to consider the following items:

First, the Defendant does not have a criminal history.

Secondly, the Defendant has made every court appearance in connection to this case.

Thirdly, the Defendant is not a danger to the community and the allegations pending against him do not involve crimes of violence. Further, the defendant was one of the first people charged with events relating to January 6—since the courts have not been imposing the condition of an ankle monitor of defendants not charged with a crime of violence.

Fourth, the Defendant has tendered his passport to his surety and does not now possess a passport.

Fifth, Defendant has ties to the community and runs his own business.

Sixth, the Defendant has complied with all of the conditions of release, including electronic monitoring, for approximately twelve months.

Seventh, the statute governing pretrial release explicitly states that a judicial officer who determines conditions are necessary to assure appearance in court or the safety of the community for a particular defendant, “*shall* order the pretrial release of the person . . . subject to the *least restrictive* further condition, or combination of conditions” 18 U.S.C. § 3142(c)(1)(B) (emphasis added).

II. Discontinue Drug Testing

In support of this Motion, the Defendant would like the Court to consider the following items:

First, the Defendant was not charged with a drug related crime.

Second, the Defendant has passed every drug test since the condition of release was imposed.

Third, the Defendant does not have a past record of any drug usage.

Fourth, required weekly testing is becoming a high expense for the Defendant to continue to pay.

III. Discontinue Weekly Reporting of Schedule

In support of this Motion, the Defendant would like the Court to consider the following items:

First, the Defendant runs his own business; therefore, while a schedule can be made it does change. As a result of such changes, the Defendant would be in violation of his release.

Second, the Defendant must take ample time once a week to create a schedule of his upcoming week. There are times Defendant is unsure of the schedule could entail.

CONCLUSION

Mr. Rae has demonstrated that he will comply with the conditions of his pretrial release and the need for continued location monitoring is more restrictive than necessary to ensure his appearance before this court and for the safety of the community. Wherefore, Mr. Rae respectfully

requests this honorable Court to grant his motion to modify the conditions of his pretrial release by eliminating the need for GPS monitoring and drug testing.

Date: March 1, 2022

Respectfully Submitted,

A handwritten signature in blue ink that reads "John M. Pierce". The signature is written in a cursive style and is positioned above a horizontal line.

John M. Pierce

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