

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

UNITED STATES

v.

EZEKIEL STECHER

Case No. 21-mj-276 RMM

* * * * *

CONSENT MOTION TO MODIFY CONDITIONS OF RELEASE

COMES NOW the Defendant, Ezekiel Stecher, by and through his attorney, Michael E. Lawlor, and Brennan, McKenna & Lawlor, Chtd., and respectfully requests that this Honorable Court modify the conditions of release in this case. In support of this motion, counsel states the following.

1. Mr. Stecher was arrested on March 9, 2021, and charged in the case captioned above.

2. Following his initial appearance, Mr. Stecher was released on 24/7 house arrest.

3. Mr. Stecher is a farmer by profession. Currently he is not permitted to leave his home to work his fields.

4. Since his release, Mr. Stecher has complied with all conditions of his supervision.

5. At this time, Mr. Stecher respectfully asks this Court to modify his conditions of release such that he be permitted to leave his home and have access to the remainder of his property for purposes of farming. If permitted, Mr. Stecher would not leave his property.

6. Undersigned counsel contacted Assistant United States Attorney Emory V. Cole about the instant request. At this time undersigned counsel is authorized to state that the United States consents to the instant request for modification of conditions of pre-trial release.

7. Additionally, undersigned counsel contacted Mr. Achme Amali from Pre-trial Services and is authorized to state that Pretrial Services does not oppose the instant request.

8. For these reasons, Mr. Stecher respectfully asks this Court to modify his conditions of release as detailed above.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this day, April 6, 2021, a copy of the foregoing was sent via ECF to the United States Attorney's Office for the District of Columbia.

/s/

Michael E. Lawlor

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PROPOSED ORDER OF THE COURT

This matter is before the Court on the defendant's Consent Motion to Modify Conditions of Release. The Court having considered the Motion, being fully advised, it is this ____ day of _____, 2021:

ORDERED, that the Motion be and the same is hereby **GRANTED**; and it is further,

ORDERED, that Mr. Stecher's conditions of release be modified to permit him to leave his home and have access to the remainder of his property for purposes of farming.

All other conditions of release originally imposed remain in full force and effect.

UNITED STATES JUDGE