

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

UNITED STATES OF AMERICA)	
)	Case No. 21-mj-148-02
v.)	Magistrate Judge Meriweather
)	Prelim. Hrg.: February 19, 2021
CHRISTINA GERDING)	

**MOTION TO MODIFY TRAVEL RESTRICTIONS
AND POINTS AND AUTHORITY IN SUPPORT THEREOF**

COMES NOW the defendant, Christina Gerding, by and through undersigned counsel, and respectfully moves this Honorable Court to modify her travel restrictions in this case. Currently, Ms. Rogers is required to not travel outside the state of Illinois without first notifying the Pretrial Services Agency (PSA). Ms. Rogers asks that this restriction be vacated and that a new restriction be imposed in its place—that is, a restriction limiting her travel to within a 100-mile radius of Quincy, Illinois without first notifying PSA. In support of this motion, Mr. Gerding would show:

1. Ms. Gerding appeared by video before the Court for her initial appearance in this jurisdiction on February 2, 2021. At that hearing, a preliminary hearing date of February 19, 2021 was set, and Ms. Gerding was ordered released on conditions. Ms. Gerding lives in Quincy, Illinois, and one of Ms. Gerding’s conditions of release was that she not travel outside the state of Illinois without first notifying PSA.

2. As it turns out, Quincy, Illinois is right on the Mississippi River and directly on the border between Illinois and Missouri. Indeed, the town of West Quincy, which is part of the greater Quincy area is in Missouri. Ms. Gerding’s daily travel patterns take her into Missouri as

much as they do Illinois. For instance, in order to help take care of her 70-year-old father, Ms. Gerding has to travel into Missouri several times a week.

3. On February 4, 2021, Ms. Gerding's PSA worker Mashiria Holman e-mailed undersigned counsel, and asked him if he would file a motion to modify Ms. Gerding's conditions of release to allow her to travel into Missouri without first having to notify PSA of her intent to do so. Ms. Holman indicated that such a modification would reduce the record-keeping burden on PSA, which is unusually high now due to the number of defendants it is currently having to supervise because of the events of January 6, 2021.

4. After consulting with Ms. Gerding, undersigned counsel believes that an appropriate travel restriction for Ms. Gerding would be to allow her to travel within a 100-mile radius of Quincy, Illinois without first notifying PSA. This would be a more realistic and workable restriction than allowing her to travel anywhere within the entire state of Illinois without first notifying PSA.

5. On February 5, 2021, undersigned counsel spoke by phone with Assistant United States Attorney Rachel A. Fletcher and advised her of his intention to file a motion seeking to modify Mr. Gerding's current travel restriction so as to permit her to travel into the state of Missouri without having to first notify PSA. Ms. Fletcher indicated that she would consider the matter and get back to counsel about her position on such a motion. As of the filing of this motion, however, counsel has not heard back from Ms. Fletcher.

6. Where a judicial officer has ordered conditions of release, that officer "may at any time amend the order to impose additional or different conditions or release." 18 U.S.C. § 3142(c)(3).

WHEREFORE, the defendant, Christina Gerding, moves this Honorable Court to modify her current travel restrictions to permit her to travel within a 100-mile radius of Quincy, Illinois without first notifying PSA.

Respectfully submitted,

/s/

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