

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

UNITED STATES OF AMERICA	)	
	)	
v.	)	Case No. 1:21-cr-00116
	)	
WILLIAM MCCALL CALHOUN, JR	)	
<i>Defendant.</i>	)	

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**DEFENDANT’S SIXTH MOTION TO MODIFY  
CONDITIONS OF PRETRIAL RELEASE**

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COMES NOW, Defendant, William McCall Calhoun, Jr., by his undersigned counsel, Jessica N. Sherman-Stoltz, Esq., through the provisions of 18 U.S.C. § 3142(c)(3), and respectfully requests that this Honorable Court modify its March 9, 2021, July 8, 2021, August 20, 2021, December 2, 2021, April 4, 2022, and July 11, 2022, Orders Setting Conditions of Release (ECF Document Number 23, July 8, 2021 Minute Order; August 20, 2021 Minute Order; December 2, 2021 Minute Order; April 4, 2022 Minute Order; and July 11, 2022 Minute Order), by allowing Defendant to travel between his residence in Georgia and his wife’s residence in Alabama, upon the discretion and permission of his Federal probation/pretrial officer. In support, he states as follows:

1. Defendant has remained under bail conditions since this Court’s March 9, 2021 order, a time period of approximately twenty-seven (27) months.
2. Per this Court’s March 9, 2021, Bail Order, Defendant is not to travel outside

of the state of Georgia (outside of Court requirements).

3. Defendant has been compliant while under pretrial supervision.
4. Defendant has no prior criminal history and no history of failures to appear.
5. Defendant has appeared at every proceeding related to his case since his initial appearance on January 15, 2021.
6. Defendant is not a flight risk and previously turned over his passport to his pretrial officer.
7. Defendant is not a danger to the community.
8. Defendant has strong ties to his community, to include many family members that live close by, and is a licensed attorney with a successful law practice that he has begun to wind down, but still has active clients and cases which require his regular appearance in local courts.
9. On a regular basis, and as he winds down his practice, Defendant is either going to court, visiting a client in jail, or in contact with a Judge, prosecutor, or law enforcement official, so his whereabouts will be readily known and easily verified.
10. In anticipation of his upcoming sentencing hearing, and as a result of his new felony conviction, Defendant is in the process of packing up and moving his personal and professional belongings to his wife's home in Alabama (address to be provided to pretrial and the Court, and address has already been

provided to the Government, but for privacy purposes for Mrs. Tina Calhoun, we prefer to not provide the address in a publicly available document).

11. Defendant would prefer to not rent a storage unit when his wife's home can accommodate his belongings, and it would be much easier to make semi-regular weekend trips with his belongings as his Court schedule permits.
12. Over the past twenty-seven (27) months Defendant has demonstrated that he willingly complies with the conditions of his pretrial release and is an active participant towards the resolution of these proceedings.
13. The attorneys for the Government, Assistant United States Attorney, Sarah C. Martin, Esq., and Assistant United States Attorney, Christopher M. Brunwin, Esq., have advised that they do not oppose this motion as long as pretrial services consents to each trip to Alabama.

WHEREFORE, for the foregoing reasons, Defendant respectfully requests that the Court grant his Sixth Motion to Modify Conditions of Pretrial Release and enter an order allowing him to travel back and forth between his residence in Georgia and his wife's residence in Alabama.

Dated: June 5, 2022.

Respectfully Submitted,  
WILLIAM MCCALL CALHOUN, JR.

/s/ Jessica N. Sherman-Stoltz  
Jessica N. Sherman-Stoltz, Esq.  
Virginia State Bar #90172

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**CERTIFICATE OF SERVICE**

I hereby CERTIFY that on this the 5th day of June, a true and correct copy of the foregoing *Defendant's Sixth Motion to Modify Conditions of Pretrial Release* with the Clerk of Court via the CM/ECF system, which will automatically send an email notification of such filing to all counsel of record.

/s/ Jessica N. Sherman-Stoltz  
Jessica N. Sherman-Stoltz, Esq.  
Virginia State Bar #90172  
Sherman-Stoltz Law Group, PLLC.