

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

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 1:21-cr-00160-002 (TJK)
)	
LOUIS ENRIQUE COLON,)	UNOPPOSED MOTION TO
)	MODIFY CONDITIONS OF
Defendant.)	PRETRIAL RELEASE

COMES NOW the defendant, Louis Enrique Colon, by and through undersigned counsel, pursuant to 18 U.S.C. § 3142 and Rule 12 of the Federal Rules of Criminal Procedure, and hereby respectfully requests this honorable court to enter an order modifying his pretrial release conditions by temporarily suspending the requirement that he be subject to Stand Alone Monitoring with GPS. In support of this motion the defendant states the following suggestions in support:

SUGGESTIONS IN SUPPORT

1. The defendant is on pretrial release and under the supervision of the U.S. Probation and Pretrial Office for the Western District of Missouri.
2. Mr. Colon’s release conditions were modified in open court on June 24, 2021, eliminating the home detention requirement and replacing it with Stand Alone Monitoring with GPS. (See Minute Entry dated June 24, 2021.)
3. The defendant respectfully requests the Court modify the conditions of his pretrial release by temporarily suspending the Stand Alone monitoring with GPS

requirement due to his current work assignment. Mr. Colon is a journeyman electrician and is currently dispatched to Louisiana to assist in rescue and damage repair operations following the devastation of Hurricane Ida. He will shortly be assigned to Baton Rouge. It is unlikely that Mr. Colon will be able to keep his GPS equipment properly charged due to the nearly total power outages suffered in the area. Because the hurricane season is active, Mr. Colon expects continued deployments to storm damaged areas. Mr. Colon is currently sharing his location through his iPhone with both the D.C. and Kansas City Pretrial Services Offices.

4. Mr. Colon will immediately notify his pretrial officer upon his return to the Western District of Missouri so that the Stand Alone Monitoring with GPS can resume. He will continue to abide by all other conditions of pretrial release, including reporting to his pretrial officer as directed while in Louisiana.

5. Neither the Western District of Missouri nor the D.C. District Court Unit Pretrial Services Office has an objection to this request. Mr. Colon has been compliant with all requirements of his pretrial release as evidenced by the most recent Pretrial Compliance Report provided to the Court dated August 2021. Further, he has been in regular contact with counsel. Undersigned counsel has been in dialogue with Assistant United States Attorney Christopher Veach as to the government's position with regard to this motion. AUSA Veach has indicated that the government has no objection to this request so long as the defendant abides by the provisions set out in paragraph 4 of this motion.

6. The defendant agrees to a ruling on this motion without the requirement of a hearing unless otherwise ordered by this court.

WHEREFORE, defendant Colon respectfully requests that the Court modify the conditions of his release as set out herein and for such further and other relief as deemed appropriate by the Court.

Respectfully submitted,

WYRSCH HOBBS & MIRAKIAN, P.C.

By: / s/ James R. Hobbs
JAMES R. HOBBS DC Bar ID MO0022
1200 Main Street
Suite 2110
Kansas City, Missouri 64105
Tel: (816) 221-0080
Fax: (816) 221-3280
jrhobbs@whmlaw.net
ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 2nd day of September, 2021, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all counsel of record.

/s/ James R. Hobbs
Attorney for Defendant