

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

UNITED STATES OF AMERICA

v.

CHRISTOPHER KUEHNE, ET. AL.,

Defendants.

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Criminal Case No: **1:21-cr-00160-TJK**

DEFENDANT KUEHNE’S MOTION TO MODIFY CONDITIONS OF RELEASE

Defendant Christopher Kuehne requests a modification of his Conditions of Release and in support thereof avers as follows:

- Mr. Christopher Kuehne was placed on pretrial release on February 26, 2021.
- Mr. Kuehne had not requested any modifications to his conditions since that time.
- Mr. Kuehne has been fully compliant with his conditions for the past year and a half while his charges have been pending.
- Mr. Kuehne now requests a modification to his conditions of pretrial release—to travel to and live in the District of Arizona, where Mr. Kuehne plans to reside beginning in September of 2022.
- Mr. Kuehne’s pretrial supervisor in the District of Columbia does not have an objection to this request and advised undersigned counsel that he is deferring to the Court.

Mr. Kuehne, therefore, requests that “condition (f)” of his Additional Conditions of Release be amended to include the District of Arizona.

Respectfully submitted,
By Counsel:

_____/s/_____
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CERTIFICATE OF SERVICE FOR CM/ECF

I hereby certify that on August 24, 2022, I will electronically file the foregoing with the Clerk of the Court for the United States District Court for the District of Columbia by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users, and that service will be accomplished by the CM/ECF system.

_____/s/_____
Marina Medvin, Esq.