UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)	
)	
v.)	CASE NO. 1:22-CR-00086-BAH
)	CHIEF JUDGE BERYL A. HOWELL
MICHAEL LEE ROCHE)	

MOTION TO MODIFY CONDITIONS OF RELEASE

Comes now Michael Lee Roche, by and through counsel, Paul Bruno, and hereby moves the Court to modify his conditions of release by allowing him to move to Glendale, Arizona following his stipulated fact bench trial that is set for Friday, March 10, 2023. Following his arrest in this case, Mr. Roche was released with the condition that he reside in Murfreesboro, Tennessee, where he was residing at the time of his arrest. Since his arrest, Mr. Roche has resided in Murfreesboro, Tennessee and has had no issues while on pretrial release.

As grounds for this motion, Mr. Roche would state and show he hopes that he will not be imprisoned as a result of this case, but he realizes and understands that imprisonment is a possibility. As a result, Mr. Roche needs to make preparations for that possibility, including moving with his family to Glendale, Arizona, where he has family and friends that can provide support to him and his family not only in the short term, but also in the event he is imprisoned for any period of time as a result of this case. Mr. Roche and his family do not have the same level of support available in Murfreesboro, Tennessee.

Mr. Roche intends to initially live with his brother until he can rent a residence for him and his family. Mr. Roche will provide his brother's address to the Court and to the U.S. Probation office. Mr. Roche anticipates having employment as soon as he arrives in Arizona.

Mr. Roche would like to address this motion following the stipulated fact bench trial on Friday, March 10, 2023, in order to answer any questions the Court may have.

Respectfully submitted,

s/ Paul Bruno

Paul Bruno, B.P.R. #17275 Attorney for Michael Lee Roche Barrett, Johnston, Martin & Garrison, LLC 414 Union Street, Suite 900 Nashville, TN 37219 (615) 244-2202 pbruno@barrettjohnston.com

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing *Motion To Modify Conditions Of Release* has been electronically delivered to Christopher Amore, Assistant United States Attorney, DOJ-USAO, District of New Jersey, 970 Broad Street, Suite 700, Newark, New Jersey 07102, on this the 6th day of March, 2023.

s/ *Paul Bruno* Paul Bruno