

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

**UNITED STATES OF AMERICA** :  
 :  
 v. : **Case No. 21-cr-562-RC**  
 :  
**BENJAMIN MARTIN,** :  
 :  
 **Defendant.** :

**UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE**

The defendant, Benjamin Martin, through appointed counsel, Federal Defender Heather Williams and Assistant Federal Defender Hootan Baigmohammadi, hereby respectfully moves this Court to modify Conditions of Release. On September 14, 2021, the Court set conditions of release that included home detention and GPS location monitoring. ECF no. 9, Conditions 7(p)(ii) and 7(q)(iv). At the February 18, 2022 Status Conference, the Court modified the home confinement condition to curfew. ECF, unnumbered entry. Mr. Martin now moves the Court to remove curfew and GPS location monitoring from his conditions of release.

Mr. Martin's Pretrial Services Officer in the Eastern District of California, Officer Frank Guerrero, supports the instant motion. He provides courtesy supervision and is directly responsible for supervising Mr. Martin. Officer Guerrero reports that Mr. Martin has been fully compliant with his conditions throughout the more than one-year period of release.

Mr. Martin's Pretrial Services Officer in the instant District, Officer Masharia Holman, does not oppose Mr. Martin's motion.

The government defers to Pretrial Services' position on whether conditions should be modified.

Respectfully submitted,

HEATHER E. WILLIAMS  
Federal Defender  
Eastern District of California  
CA Bar Number 122664

Date: December 5, 2022

By: /s/ Hootan Baigmohammadi  
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	:	
<b>Defendant.</b>	:	

**ORDER MODIFYING CONDITIONS OF RELEASE**

For good cause shown and for the reasons in Mr. Martin’s Unopposed Motion to Modify Condition of Release filed on December 5, 2022, it is hereby ORDERED as follows.

1. The curfew condition that the Court ordered orally on the record at the February 18, 2022 Status Conference, which amended the Order Setting Conditions of Release (ECF no. 9, Condition 7(p)(ii)(home detention), shall be removed as a condition of release.
2. The GPS location monitoring condition (ECF no. 9, Condition 7(q)(iv)) shall be removed as a condition of release.

All other conditions shall remain unchanged.

Date:

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RUDOLPH CONTRERAS  
UNITED STATES DISTRICT JUDGE