

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No. 21-cr-28

JAMES D. BEEKS,

Defendant.

UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE

James Beeks, by counsel,¹ moves the Court for an order permitting him to permanently reside in and be supervised by Pretrial Services in the Middle District of Florida. For the last 6 months, Beeks has struggled to secure permanent employment and housing. During that time, he has mostly been supervised by the District of Columbia Pretrial Services office, while he has lived in a remote area of North Carolina with family and, more recently, back in the Orlando area while he has sought more permanent housing and employment. During this time, Beeks has been reporting to Pretrial Services remotely through daily telephone contact. Beeks is now in a position to remain permanently in the Orlando area. He has secured a residence starting October 1, 2022. And while he has not yet secured full-time employment, he continues to generate income working as a driver for rideshare services.

¹ The defense had indicated to the Court that it would provide an updated report on Beeks' bond status by September 16, 2022. The defense missed that deadline and apologizes to the Court.

The defense therefore seeks an order permitting Beeks to reside in the Middle District of Florida and be supervised by Pretrial Services in that district with standard release conditions that are currently in place. The one special condition that the parties propose is that Pretrial Services conduct a home visit of Mr. Beeks' proposed residence. The defense will provide the address to Pretrial Services. The defense has consulted with counsel for the government, who indicated that it does not oppose this motion.

Dated at Milwaukee, Wisconsin, this 30th day of September, 2022.

Respectfully submitted,

/s/ Joshua D. Uller

Joshua D. Uller, WI Bar #1055173

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Counsel for Defendant, James Beeks

CERTIFICATE OF SERVICE

On this 30th day of September, 2022, I filed the foregoing document electronically with the Clerk of the Court for the United States District Court for the District of Columbia by using the Court's CM/ECF system, which will provide electronic service on all counsel of record.

/s/ Joshua D. Uller
Joshua D. Uller