

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

UNITED STATES OF AMERICA :

:

Criminal No. 1:22-MJ-00047 (ZMF)

:

RALPH JOSEPH CELENTANO III :

**UNOPPOSED MOTION FOR MODIFICATION OF
CONDITIONS OF RELEASE**

Ralph Joseph Celentano III, respectfully requests this Honorable Court modify his release conditions by lifting the condition that Mr. Celentano submit to testing for prohibited substances. In support of this Motion, counsel states the following facts.

1. On March 9, 2022, Mr. Celentano was arrested in Broad Channel, New York on charges relating to the events on January 6, 2021 at the U.S. Capitol.
2. On March 9, 2022, Mr. Celentano was released on an appearance bond with several conditions in the Eastern District of New York.
3. On March 15, 2022, Mr. Celentano made his initial appearance in the District of Columbia via Zoom. During that appearance, the Honorable Magistrate Judge Robin M. Meriweather ordered that Mr. Celentano remain on personal recognizance, and the standard conditions of release were set, with the additional condition of drug testing.
4. Pretrial Services in the Eastern District of New York is supervising Mr. Celentano as a courtesy to Pretrial Services in the District of Columbia.
5. At the time of Mr. Celentano's initial appearance in the District of Columbia on March 15, 2022, Pretrial Services requested that drug testing be a condition of his release.

6. On March 20, 2022, defense counsel conferred with the Government about the instant motion, and the Government indicated that they would take no position.
7. On March 24, 2022, defense counsel conferred with Pretrial Services about the instant motion, and Pretrial Services indicated that they would take no position.

Conclusion

Wherefore, for the foregoing reasons, Mr. Celentano respectfully requests that the Court order the aforementioned modification to the bail conditions previously imposed on Mr. Celentano.

Respectfully submitted,

/s/

Marissa Sherman
Assistant Federal Defender
Federal Defenders of New York, Inc.
One Pierrepont Plaza, 16th Floor
Brooklyn, NY 11201
(718) 407-7408