

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :  
 :  
 v. : **Crim. No. 1:22-cr-00015-APM**  
 JOSHUA JAMES :

---

**MOTION FOR MODIFICATION OF MR. JAMES' CONDITIONS OF RELEASE**

Comes Now, Joshua James, and respectfully files the within *Motion to Modify Conditions of Release*. Counsel has consulted extensively with the government regarding this request and the reasons therefore, and the government does not oppose this request.

Mr. James has been on conditions of release, including GPS monitoring and home detention, since April 9, 2021. At issue in Mr. James' motion is whether, after thirteen months of compliance (which, since August 30, 2021, has included travel outside the home for work purposes within a sixty-mile radius), Mr. James should now be allowed to travel within a sixty mile radius without further time and place restrictions between the hours of 8:30 a.m. and 5:30 p.m. Monday through Friday<sup>1</sup> and 8:30 a.m. to 8:30 p.m. Saturday and Sunday. Mr. James also asks for extended weekday hours – until 8:30 pm - two days per week to attend mental health-

---

<sup>1</sup> Mr. James' current conditions allow travel for work purposes within a sixty-mile radius until 7 p.m. Monday through Friday. This motion seeks an order allowing travel within that radius for any purpose until 5:30 p.m. Monday through Friday, but until 7 p.m. for work purposes only.

related treatment.<sup>2</sup> This proposal includes the continuation of all previously-ordered conditions, including GPS monitoring.

Concerning his family and life circumstances, Mr. James incorporates the facts contained in his April 2021 *Motion for Bond, ECF 42* in case number 21-CR-28 (APM). Mr. James lives with his wife and three children in a very rural area outside Arab, Alabama. Ms. James works full-time as a realtor. Since the pendency of this case, she has also had to be the sole parent responsible for outside-the-home activities for the children and other regular and necessary family errands. This motion seeks to alleviate these and other burdens and stresses and to allow Mr. James to spend time with his family outside the home during daytime hours within a radius which is reasonable and consistent with the distance now allowed for work travel.

Given Mr. James' lack of criminal record, his acceptance of responsibility as demonstrated by his March 2, 2022 pleas of guilty, the government's agreement with this proposal, and compliance with previously-ordered conditions of release for over a year, Mr. James submits that his request for modified conditions is reasonable and should be granted.

For the above-stated reasons, Mr. James respectfully requests that his motion be granted.

Respectfully submitted,

By Counsel

\_\_\_\_\_/s/\_\_\_\_\_  
\_\_\_\_\_

Christopher Leibig, Esq.  
Virginia Bar No. 40594

---

<sup>2</sup> Mr. James requests that the Court's order reflect that his weekday curfew be extended to 8:30 pm two days per week provided that the time between 5:30 and 8:30 pm is for travel to and attendance at a therapeutic meeting.

Counsel for Defendant  
114 N. Alfred Street  
Alexandria, Virginia 22314  
(703) 683 4310  
[chris@chrisleibiglaw.com](mailto:chris@chrisleibiglaw.com)

\_\_\_\_\_/s/\_\_\_\_\_  
Joan C. Robin  
Virginia Bar No. 44502  
Law Office of Joni C. Robin, PLLC  
114 North Alfred Street  
Alexandria, Virginia 22314  
Ph: 703-349-1111  
Fax: 571-279-6851  
[joni@jonirobinlaw.com](mailto:joni@jonirobinlaw.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on the 12th day of May 2022, I will electronically file the foregoing Notice with the Clerk of Court using the CM/ECF system, which will then send a notification of said filing (NEF) to counsel of record.

\_\_\_\_\_/s/\_\_\_\_\_  
Christopher Leibig