

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

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

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**AMENDED MOTION TO MODIFY CONDITIONS OF RELEASE**

Joshua James, by undersigned counsel, respectfully moves this Court to amend its Order, dated May 16, 2022<sup>1</sup>, in order to permit him to leave his residence for any reason between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday and between the hours of 7:00 a.m. and 8:30 p.m. Saturday and Sunday.<sup>2</sup> Undersigned counsel has consulted with the government, who does not oppose this request. In support of this request, Mr. James offers the following:

1. On May 12, 2022, Mr. James filed a motion seeking to amend the conditions of his bond by placing him on curfew instead of home confinement. *See* 1:22CR15, docket entry 134. Prior to the May 12, 2022 motion, Mr. James was on home confinement but he was permitted to be outside his home from 7:00 a.m. to 7:00 p.m. for work. *See* Minute Order in Criminal Case No. 1:21CR28, dated August 30, 2021.

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<sup>1</sup> The Order, which is dated May 16, 2022, was filed on May 17, 2022.

<sup>2</sup> The May 16, 2022 Order additionally permitted Mr. James to be outside his home until 8:30 p.m. two weekdays per week for purposes of attending therapeutic meetings. Mr. James does not seek to change that portion of the Order.

2. On May 16, 2022, this Court granted Mr. James motion to modify the conditions of his bond by placing him on curfew in lieu of home confinement. *See* 1:22CR15, docket entry 141. The Order, in relevant part, permits Mr. James to leave his residence for any reason between the hours of 8:30 a.m. and 5:30 p.m. Monday through Friday and 8:30 a.m. to 8:30 p.m. Saturday and Sunday.
3. The intention of the motion was to permit Mr. James, who has complied with his bond conditions for nearly 13 months, to have additional time outside of his home to spend with family and to alleviate the additional burdens (such as child pick-up and drop-off, running errands and the like) that his wife has had to assume over the past 13 months as a result of Mr. James's home confinement. The parties did not intend for the motion to interfere with or place additional limits on the hours that Mr. James was previously permitted to work outside the home.
4. It has recently come to the attention of undersigned counsel that, contrary to the parties' intentions, Pretrial Services has interpreted the May 16, 2022 Order to prohibit Mr. James from going to work before 8:30 a.m or from returning home from work later than 5:30 p.m.
5. This development has interfered with Mr. James's work and forced him to cancel or reschedule a job that he was scheduled to perform yesterday morning.
6. In order to remedy this issue, Mr. James now asks this Court to amend the May 16, 2022 Order to permit him to leave his residence for any reason between 7:00 a.m. and 7:00 p.m. Monday through Friday, and between 7:00 a.m. and 8:30 p.m. Saturday and Sunday.

Respectfully submitted,

By Counsel

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

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 24th 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.

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Joan Robin