

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>Case No: 22-CR-15 (APM)</b>
	:	
<b>JOSHUA JAMES,</b>	:	
<i>Defendant</i>	:	

**DEFENDANT’S CONSENT MOTION TO MODIFY CONDITIONS OF PRETRIAL  
RELEASE**

The Defendant, Joshua James, by undersigned counsel, respectfully moves this Honorable Court to modify the conditions of his release. Undersigned counsel has consulted with the government, who does not oppose this request. In support of this motion, Mr. James states as follows:

1. On September 13, 2022, this Court granted Mr. James’s motion to amend the conditions of his bond to permit limited internet access for work purposes. *See* docket entry 311.
  
2. It has recently come to the attention of undersigned counsel that the September 13, 2022 Order has had the unintended consequence of requiring Mr. James to own two cell phones; one that is capable of accessing the internet for his work purposes, and another that is not capable of accessing the internet, which he must use for all personal telephone calls. The parties did not intend for Mr. James to have to use two phones and pay two monthly cell phone bills. In order to correct the problem, Mr. James proposes the following language, to which the government does not object:

The defendant may access the internet for the sole purposes of: (1) attending court hearings; (2) communicating with his counsel and defense team; (3) reviewing discovery

materials with counsel and defense team; and (4) any business-related jobs and communications with business customers and potential business customers. The defendant may not access the Internet for any other purposes.

3. Additionally, Mr. James — who has remained in substantial compliance with the conditions of his release since his release 18 months ago — asks this Court to amend his curfew hours to require him to be home between the hours of 9:00 p.m. and 6:00 a.m. Currently Mr. James's curfew conditions require him to be home between the hours of 7 p.m. and 7 a.m. Monday through Friday and between the hours of 8:30 p.m. and 7 a.m. on Saturday and Sunday. The extra time outside the home will allow Mr. James to seek and maintain additional part-time employment to supplement his family's income. Although Mr. James owns his own business, during the late fall and winter his business slows down. Due to that dip in business, coupled with the loss of his monthly military benefits stemming from his conviction in this case, Mr. James must seek additional employment avenues to support his family.

Respectfully submitted,

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/s/

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/s/

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 12th day of October, 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/\_\_\_\_\_  
Joan Robin