

**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 and Mr. James’s Pretrial Officer, Mr. Ethan King, who do not oppose this request. In support of this motion, Mr. James states as follows:

1. Mr. James has remained in substantial compliance with the conditions of his supervised release since his release from custody 21 months ago. As a result, the conditions of his release have gradually abated. His current release conditions include location monitoring, a curfew from 9:00 p.m. to 6:00 a.m. and a 60 mile travel restriction.
  
2. As detailed in Mr. James’s last motion to modify bond conditions, he has had to seek a second job due to his loss of military pension and benefits stemming from his guilty plea in this case. Additionally, his power washing business has slowed significantly during the late fall and winter months.

3. Due to his substantial financial struggles, Mr. James has secured a second job as a welder. According to Mr. James's employer,<sup>1</sup> "at times [the company's] service area exceeds [Mr. James's] allowed radius of travel and he is unable to accompany his teammates creating issues with scheduling. Joshua is also being considered for promotion which would require travel outside of his currently allowed radius and this would also place restraints on his position." Additionally, the company periodically has jobs that would require Mr. James to travel overnight. One such job will take place in Birmingham, Alabama this weekend.<sup>2</sup>
4. Accordingly, in light of Mr. James's compliance with pretrial release to date and his imminent job travel requirements, Mr. James requests this Court to amend his bond conditions to: i) remove the curfew and location monitoring conditions; and ii) substitute the 60 mile radius restriction with a restriction requiring Mr. James's to abide by the following travel restrictions:

Stay away from Washington, D.C., except for attendance at Court proceedings, meetings with counsel, and required PSA business; notify Pretrial Services in advance of all travel outside of the Northern District of Alabama; receive the Court's approval for any travel outside the continental U.S.

Respectfully submitted,

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/s/

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<sup>1</sup> See attached redacted letter from employer. An unreacted copy was provided to the Government.

<sup>2</sup> See *id.*

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\_\_\_\_\_/s/\_\_\_\_\_  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 19th day of January, 2023, 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