

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

)	
)	
UNITED STATES OF AMERICA,)	
)	
v.)	Criminal Action No. 21-CR-178 (APM)
)	
SHELLY STALLINGS, et al.,)	
)	
Defendants.)	
)	

MOTION TO AMEND CONDITIONS OF RELEASE

Comes the defendant, Shelly Stallings, by counsel, and moves the Court to amend the conditions of release herein by removing condition 7(q)(iv) which requires her to submit to GPS location monitoring. (DN 74 Order Setting Conditions of Release).

As grounds for said motion, defendant states that she has been totally compliant with the conditions of her release with no violations whatsoever and has been reporting to her supervising probation officer as directed, timely submitting to all requested drug tests, and attending required mental health and drug abuse evaluations. The GPS monitoring, however, has proved unduly burdensome. Defendant advises the undersigned that on March 2, 2022, she had to undergo an upper GI evaluation and a lower GI evaluation which required the GPS monitoring bracelet to be removed by her probation officer and then reapplied afterward. On March 4, 2022, she underwent a bone scan related to possible recurrent cancer, which again required her probation officer to remove the bracelet and reapply it later. She is currently

scheduled for a PET scan and a repeat of the upper GI evaluation on April 20, 2022, both of which will again require removal and re-application of the bracelet.

/s/ Scott T. Wendelsdorf (Ky. Bar. No. 75790)
Federal Defender
629 Fourth Avenue
200 Theatre Building
Louisville, Kentucky 40202

(502) 584-0525
Scott_Wendelsdorf@fd.org

Counsel for Defendant.

CERTIFICATE

I hereby certify that on March 18, 2022, I electronically filed the foregoing with the clerk of the court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Scott T. Wendelsdorf