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

UNITED STATES OF AMERICA	)	Criminal No. 21-CR-735
	)	
vs.	)	
	)	
JAMES ROBERT ELLIOTT	)	
	)	
Defendant.	)	

## CONSENT MOTION TO BE PARTIALLY RELEASED FROM ANKLE MONITOR

Defendant, James Robert Elliott, by and through his counsel, James L. Welsh, III, Esquire, submits this Consent Motion to be partially release from ankle monitor during the remaining time Defendant has before he begins his 37 month prison sentence on July 26, 2023.

- 1. Defendant, James Elliott, pled guilty to a 1111(a) felony and then was sentenced to a 37 month sentence to begin on July 26, 2023.
- 2. Defendant, James Elliott, has two (2) small children that he would like to take swimming and other social activities prior to his 37 plus year incarceration on July 26, 2023.
- 3. This Court prior to, and at sentencing, commended Defendant for doing the right things and applauded his efforts to comply with all of his conditions of release.
- 4. With the precious little time remaining before he has been ordered to report to prison, Defendant's counsel received consent from AUSA Loeb to allow Defendant to be off monitor so he could enjoy recreational activities, with his children including swimming.
- 5. Defendant agrees that his monitor will be re-activated at curfew so this Court can monitor his whereabouts prior to incarceration.

WHEREFORE, Defendant respectfully requests this Honorable Court grant Defendant's Motion so Defendant can enjoy several recreational activities with his small children prior to his prison sentence.

Respectfully submitted,

The Welsh Law Group, LLC

By:

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## CONSENT ORDER OF COURT

AND NOW, to wit, Defendant James Elliott, is to be released from electronic monitoring from 8:00 a.m. until curfew so he may take his children swimming or other recreational activities and shall return by his 10:00 p.m. curfew. Said Order shall be in effect from date issued until his incarceration on July 26, 2023. The Court consents to this Motion.

BY THIS COURT	
	J