

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	CASE NO. 21-CR-738 (BAH)
v.	:	
	:	
MICHAEL OLIVERAS,	:	
	:	
Defendant.	:	

**GOVERNMENT’S MOTION TO CONVERT THE VIDEOCONFERENCE
PRETRIAL VIOLATION HEARING TO AN IN PERSON HEARING**

The United States respectfully requests that the Court convert the scheduled videoconference pretrial violation hearing to an in person hearing. On December 31, 2022, Pretrial Services filed a Status Report indicating that defendant, Michael Oliveras, be removed from Pretrial Supervision due to non-compliance. ECF No. 47 at 2. In the report, Pretrial Services notes that defendant has not reported as directed. Pretrial Services has reported that defendant failed to report during the dates of September 19, 2022 – October 19, 2022, and again on December 23, 2022. *Id.* Pretrial Services further states that defendant has failed to provide employment verification, despite numerous requests over the last several months. Additionally, Pretrial Services has not been able to conduct home assessments. *Id.*

The Court scheduled a Pretrial Violation Hearing set for January 6, 2023, by videoconference unless the Defendant wishes to appear in person. Minute Order (January 3, 2023). Given the serious nature of the repeated violations, especially in light of the upcoming trial scheduled to commence in February 2023, we respectfully request that the Court convert the hearing to be held in person.

Counsel for the defendant has indicated that they oppose this request and intend to file a document to that effect.

Respectfully submitted,

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D.C. Bar No. 481052

By: /s/
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Dated: January 3, 2023

CERTIFICATE OF SERVICE

On January 3, 2023, a copy of the foregoing was served on counsel of record for the defendant via the Court's Electronic Filing System.

/s/ Ashley Akers

ASHLEY AKERS

Trial Attorney

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