

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

DAVID RENE ARREDONDO

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NO. 1:22-CR-373-RCL

**AMENDED MOTION TO AMEND CONDITIONS OF RELEASE
AND REQUEST FOR ZOOM HEARING**

Comes Now, the Defendant, David Rene Arredondo, by and through the undersigned attorney, and files this Amended Motion to Amend Conditions of Release and Request for Zoom Hearing with the Court, and in support thereof would show the following:

Mr. Arredondo seeks amendment of his condition of wearing an ankle monitor and his curfew. On November 8, 2022, the Honorable G. Michael Harvey set a personal recognizance Appearance and Compliance Bond.

Mr. Arredondo is a 47-year-old U.S. Citizen. Part of Mr. Arredondo's release conditions require that he be placed on location monitoring system and a curfew. *See* Order Setting Conditions of Release at Doc. 10. Mr. Arredondo is compliant with all the conditions of release including the electronic monitoring and curfew and is current with all monitor fees. Due to logistical reasons, Mr. Arredondo requests that he be released from electronic location monitoring and curfew thereby allowing him to continue with his profession. Mr. Arredondo has a business which requires Mr. Arredondo to scour through junk yards purchasing and removing various equipment and machinery parts. For these reasons, his workspaces have very little space and many jagged

edges. With the ankle monitor in place, Mr. Arredondo cannot wear his steel toed boots which also provide safety in performance of his job. Further, Mr. Arredondo works with steel which more than once has set off an alarm on his ankle monitor. Due to the cramped spaces, Mr. Arredondo has bumped and broken one ankle monitor having to replace it. The removal of this ankle monitor would create less of a hazard to Mr. Arredondo's safety and ability to crawl around within the junk yards. This type of activity causes damage to the ankle monitor.

Mr. Arredondo requests the curfew now in place be lifted thereby allowing Mr. Arredondo to exercise full ability in his business which is not an 8:00 a.m. to 5:00 p.m. job. Many times Mr. Arredondo is called by customers to transact his business after hours. Allowing Mr. Arredondo to work at his job without a curfew would allow him to perform the duties of his work better and more successfully. Mr. Arredondo is in the salvage business and his employment is not limited to one particular office. Mr. Arredondo's business is not limited in location or time of the work.

AUSA Raymond Woo has been contacted and is opposed to the granting of this request. Pretrial Services takes no position. Defendant requests that this matter be set for zoom hearing at the court's earliest possible convenience.

WHEREFORE, PREMISES CONSIDERED, Mr. Arredondo requests that this Honorable Court set this matter for zoom hearing and after oral arguments, grant this motion to amend the conditions of release to allow for the removal from electronic location monitoring and curfew.

Respectfully Submitted,

Maureen Scott Franco
Federal Public Defender

/S/

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CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of August, 2023, I electronically filed the foregoing with the Clerk of Courts using the CM/ECF system which will send notification of such filing to the following: AUSA, Raymond Woo, Office of the U.S. Attorney, 601 D Street, NW; Washington, DC 20530.

/S/

JOHN P. CALHOUN
Attorney for Defendant