

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

**UNITED STATES OF AMERICA**

**v.**

**ZACHARY JOHNSON**

**No. 1:22-cr-11-RJL**

**UNITED STATES' RESPONSE TO DEFENDANT'S  
MOTION TO MODIFY CONDITIONS OF RELEASE**

As the defendant correctly states in his pending motion to modify his conditions of release, ECF 85, the United States has no objection to (1) converting his current condition of location monitoring via GPS ankle bracelet to a curfew monitored by periodic calls to a landline he must answer during the curfew period; and/or (2) allowing the defendant to travel outside of the Tampa Division, but still within the Middle District of Florida (MDFL), to work, so long as he first secures approval from MDFL Pre-Trial Services, provides any documentation they request, and follows whatever procedures they require.

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