

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :
v. : 22-MJ-206
HENOS WOLDEMICHAEL : FILED UNDER SEAL

**UNOPPOSED MOTION TO MODIFY RELEASE CONDITIONS BY ELIMINATING
CURFEW REQUIREMENT**

Mr. Henos Woldemichael, through undersigned Counsel, respectfully requests that this Court eliminate the curfew imposed as part of his original release conditions, a request to which the Government does not object. In support of the foregoing Counsel states the following:

1. Mr. Woldemichael, through Counsel, filed a waiver of his preliminary hearing on November 23, 2022. Counsel and the Government remain in discussions regarding a potential resolution short of trial in this case.
2. Mr. Woldemichael currently works Mondays and Wednesday through Saturdays at his long-term position [REDACTED]. He will soon be starting a position at [REDACTED] on Tuesdays and Sundays, and has been working [REDACTED] for the last few weeks after work in the evenings and on weekends to earn additional income.
3. Mr. Woldemichael's goal is to save money in order to return to school for IT related training, and to work towards financial independence.

4. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

- [REDACTED]
- [REDACTED]
5. The Bail Reform Act specifies that individuals released pretrial should be “subject to the least restrictive further condition, or combination of conditions, that...will reasonably assure the appearance of the person as required and the safety of any other person and the community.” See 18 USC §3142 (C)(1)(B).
 6. Mr. Woldemichael’s general record of compliance with what are very strict conditions and openness with his Pretrial officer to date demonstrate that these conditions are not the least restrictive conditions that will ensure Mr. Woldemichael’s appearance and the safety of the community. As such, Counsel respectfully requests that the curfew be removed in this case.
 7. Counsel contacted assigned government counsel for this matter, AUSAs Stephen Rancourt and Victoria Sheets, regarding the government’s position on this request, who indicate they do not oppose this request.

WHEREFORE Counsel respectfully requests that the Court remove Mr. Woldemichael’s curfew requirement ordered as part of his release conditions in this case.

Respectfully submitted,

A. J. KRAMER
FEDERAL PUBLIC DEFENDER

/s/

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