

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

JESSE WATSON,

DEFENDANT

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CRIMINAL NO. 23-CR-87 (RBW)

**MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE**

The Defendant, Jesse Watson, by his counsel, Nicole Cubbage, hereby respectfully requests the Court to allow a modification of Mr. Watson's conditions of pretrial release because of his recent move from the Western District of Washington to the Middle District of Tennessee. In support of this motion, undersigned counsel states the following:

1. Mr. Watson has secure employment in the Middle District of Tennessee and has moved there to start his new job.
2. Mr. Watson spoke with his pretrial services officer prior to taking the job and moving to start employment and sought approval for a transfer of his pretrial supervision.
3. Jade Friedman, the pretrial services officer assigned to Mr. Watson's case in the DC U.S. District Court informed undersigned counsel that Mr.

Watson's transfer of supervision request was approved by her office and by the office in the Middle District of Tennessee but that a modification of the conditions of pretrial release, and an order of this court approving such modification, was required.

4. Pretrial services from the Middle District of Tennessee requests that the modification of pretrial release conditions be as follows:
  - a. Modify 7(a) to the following— Submit to supervision by and report for supervision to the Middle District of Tennessee, as directed. Verify address and telephone numbers with pretrial services for the Middle District of Tennessee.
  - b. Modify 7(d) to surrender any passport to Pretrial Services in the Middle District of Tennessee.
  - c. Modify 7(t) to say that the Defendant must notify Pretrial Services for the Middle District of Tennessee in advance of any and all travel outside the district and that the Defendant shall receive and comply with courtesy supervision of the Middle District of Tennessee.

Based on the foregoing reasons, Defendant Watson respectfully requests an order modifying his conditions of pretrial release as set forth

above so that he may transfer his supervision to the Middle District of Tennessee.

Respectfully Submitted,

NICOLE CUBBAGE

By:

        /s/        

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Certificate of Service

I certify that a copy of the forgoing was filed electronically for all parties of record on this 6th day of July, 2023.

        /s/        

Nicole Cubbage  
Attorney for Mr. Watson