

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA *
VS. * ADC 19-2413
TAMUFOR ST. MICHAEL *

CONSENT MOTION TO MODIFY CONDITIONS OF RELEASE

The Defendant, by and through his attorney, Robert C. Bonsib, Esq., respectfully requests this Honorable Court to modify the Defendant's conditions of release and, as reasons therefore, states as follows:

1. The Defendant has been charged in the above matter with firearms related offenses. The Defendant is on a 7 p m to 7 am curfew.
2. As of January 6, 2020 the Defendant has been permitted to return to his job at Andrews Air Force Base and need expanded curfew hours to afford him sufficient time to travel to and from his home and his place of employment.
3. Pretrial Service Officer Kenneth Langston has advised undersigned counsel that Pretrial consents to modifying the current conditions of release to a location monitored 8 pm to 5 am curfew. Assistant United States Attorney Kathleen Gavin has authorized undersigned counsel to represent that the government has no objection to this request.

WHEREFORE it is respectfully requested that this Honorable Court modify the Defendant's conditions of release to a location monitored 8 pm to 5 am curfew.

Respectfully submitted,

/s/ Robert C. Bonsib

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was sent, via ECF, this 9th day of January, 2020 to Assistant United States Attorney Kathleen Gavin and James Wallner.

/s/ Robert C. Bonsib

ROBERT C. BONSI