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September 8, 2023

VIA PACER

Honorable Ann Marie Donio
United States Magistrate Judge
Mitchell H. Cohen Courthouse
4th And Cooper Streets
Camden NJ 08101-0000

Re: USA v. Adrienne Ponzo
Case No.: 23-mj-2053 (AMD)

Dear Judge Dunio,

As the court is aware, the undersigned was appointed to represent Ms. Ponzo in the above referenced matter. On behalf of the defendant, kindly accept this letter as a request for a hearing regarding change of conditions of release for the defendant, who is currently under home detention – (DOC. 11). Ms. Ponzo is currently supervised by US. Pretrial Services in the Eastern District of Pennsylvania as she is a Pennsylvania resident.

Ms. Ponzo is permitted to work and currently has a job with Sloan Monroe Logistics, supervised by Samantha Hollis (302) 298 – 5891. Her employment information is attached here to as Exhibit “A”. Ms. Ponzo has a commercial driving license, (CDL), and Sloan Monroe Logistics has additional duties for her including driving loads to different states.

Because Ms. Ponzo has two special needs children she really needs the income to keep her family afloat. She is seeking modification of her conditions of release to be allowed to travel for work related purposes and will report her work schedule and whereabouts to US Pre-trial services as required.

The Government opposed her release during her initial appearance (DOC. 11) The undersigned argued the defendant was not a flight risk and did not pose a threat to the community, and pursuant to 18 U.S.C (§) 3142 (c) there were reasonable measures to ensure the defendant would not flee and endanger the safety of any persons of the community. The Court agreed. Ms. Ponzo has abided by those conditions and seeks only this modification for work related purposes.

I have reached out to the Government and U.S. Pre-Trial seeking consent but have not heard back regarding a consent or objection. This Motion follows.

The defendant respectfully requests a hearing on this matter as soon as the court is available.

Thank you for your attention and courtesies in this matter.

Respectfully submitted,

/s/ Troy A. Archie, Esq.

cc: Daniel A. Friedman, AUSA
Acheme Amali, US Pre-Trial NJ
Charles Meissler, US Pre-Trial EDPA