IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION

UNITED STATES OF AMERICA	*	
v.	*	**Criminal No.: 22-mj-01286-JMC**
AHMED SARY	*	
Defendant	*	

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CONSENT MOTION TO TEMPORARIILY MODIFY CONDITIONS OF RELEASE

The Defendant, Ahmed Sary, by undersigned counsel, hereby files this Motion to Temporarily Modify Conditions of Release, and states the following in support thereof:

1. Mr. Sary was released from detention on May 13, 2022. As a condition of release, Mr. Sary is required to submit to home confinement enforced by electronic monitoring.
2. Mr. Sary has maintained compliance with all conditions of his release to date.
3. Mr. Sary would like to attend a birthday celebration for his minor daughter on Sunday, September 25, 2022, outside of his residence. Specifically, Mr. Sary and his wife would like to take their daughter to a movie at Cinemark Egyptian 24 and dinner at the Olive Garden, each of which are located within the Arundel Mills Mall complex, between 12:00 p.m. and 7:00 p.m. The exact address of each establishment has been provided to Mr. Sary's pretrial supervision agent.
4. A similar request relating to Mr. Sary's other minor daughter was granted in July of 2022. Mr. Sary maintained complete compliance with all release conditions while on leave from his residence pursuant to that request.
5. U.S. Pretrial Supervision Agent, Celine Ferguson, has no objection to this request.

6. Assistant United States Attorney, Paul Riley, has advised undersigned that the Government does not object to this request.

7. WHEREFORE, the Defendant respectfully requests that this Court grant his request and temporarily modify the conditions of his release.

Respectfully submitted,

_____/s/_____

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 22nd day of September 2022, a PDF version of this Motion was filed electronically via ECF with the Clerk of the United States District Court for the District of Maryland and thereby served upon Assistant U.S. Attorney, Paul Riley. A copy of this motion was also emailed to U.S. Pre-trial Agent, Celine Ferguson.

_____/s/_____
Julie M. Reamy

Attorney for Ahmed Sary