IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

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

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CONSENT MOTION FOR MODIFICATION OF RELEASE CONDITIONS

The Defendant, Ahmed Sary, by and through counsel, Julie M. Reamy, respectfully moves for an order of this Court authorizing a modification of his release conditions and states the following in support of his motion.

1. Mr. Sary was released from detention in this case on May 13, 2022. As a condition of his release, Mr. Sary was initially required to submit to home confinement enforced by electronic monitoring. In October of 2022, the home confinement condition was replaced with a curfew with continued electronic monitoring.
2. Mr. Sary has maintained compliance with all conditions of release since his release from detention in this case.
3. Mr. Sary is requesting a modification of his release conditions that would remove the curfew and place him on electronic monitoring through a stand-alone device. This technology will allow the Pretrial Services Office to monitor Mr. Sary's movement and set digital boundaries such as airports and state lines that he may not cross without alerting his supervision agent. Mr. Sary's supervision agent has recommended this condition in place of the curfew and current residence-based monitoring due to his longstanding compliance with all release conditions.

4. U.S. Pretrial Supervision Agent Desiree Akuchie has advised undersigned that she has no objection to this request.

5. Assistant U.S. Attorney, Paul Riley, has advised that the Government has no objection to this request.

WHEREFORE the Defendant prays that the Court grant his request and issue an modifying his conditions of release as proposed above.

Respectfully submitted,

/s/ *Julie M. Reamy*
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24th day of July 2023, this document was filed with the Clerk of U.S. District Court and a copy served upon, Assistant United States Attorney, Paul Riley.

/s/ *Julie M. Reamy*
Julie M. Reamy