

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO: 21-mj-02512-CMM

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CARLOS VAZQUES,

Defendant.

AGREED MOTION TO MODIFY COURT ORDERED CONDITION OF RELEASE

The Defendant, **Carlos Vazquez**, by and through his undersigned counsel, respectfully requests that the Honorable Court enter an Order allowing the Defendant to sign and return his appearance bond papers within 24 hours of being released from custody. As grounds for this request, the Defendant states the following:

1. At the Bond Hearing on March 29, 2021, the Honorable Court ordered the following appearance bond conditions:

- A \$500,000.00 personal surety bond to be co-signed by Ms. Annabel Lee. Ms. Lee has already signed the surety section of the appearance bond.
- A \$50,000.00 10 percent bond with a Nebbia satisfaction requirement.
- Surrender of all passports and travel documents.
- Random urine testing by Pretrial Services and follow-up treatment if deemed necessary.
- Participate in a mental health assessment and treatment.

- No contact with Government witnesses.
- No possession of firearms, ammunition or any other dangerous devices.
- The Defendant is prohibited from entering his personal residence at 5249 NW 7th Street, Apartment # 408, Miami, Florida 33126 until the Case Agent or other arrangements are made to retrieve the firearm located at the residence.
- The Defendant has to reside with Ms. Annabel Lee at 15479 SW 35 Terrace, Miami, Florida 33185 upon his release from custody.

3. AUSA Hayden O'Byrne has no objection to the Honorable Court modifying the condition of bond by allowing the Defendant to sign and return the appearance bond papers within 24 hours of his release from custody.

WHEREFORE, **Mr. Vazquez** respectfully requests that the Honorable Court grant the relief requested in this Agreed Motion to Modify Court Ordered Condition of Release.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 31, 2021, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or *pro se* parties, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

Respectfully submitted,

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