UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA,

Plaintiff,

v. CASE NO. 21-60171-CR-SMITH

CINDI ELLIS DENTON,

Defendant.
_____/

DEFENDANT'S MOTION FOR PERMISSION TO RESIDE AT NEW/CHANGED ADDRESS

The Defendant, CINDI ELLIS DENTON, by and through her undersigned counsel, respectfully requests this Honorable Court enter an Order granting her permission to reside at her new/changed address. As grounds therefore, it is respectfully submitted:

1. On April 7, 2021, the Court set a $26,000.00 personal surety bond continuing the bond that had been set in California. [ECF No. 8] On October 8, 2021, this Court sentenced Ms. Denton to six months imprisonment with a self-surrender before 2 p.m. on January 10, 2022. [ECF No. 53]

2. One of the standard conditions of bond (i.e., No. 3) is that the Defendant may not change her present address without prior notification and approval from the U.S. Probation Officer or the Court. On or about last Thursday, December 2nd, Ms. Denton was evicted and/or told to leave the residence as the owner was in the process of selling the residence. As a result, Ms. Denton has changed her residence.

3. The Defendant is seeking permission to remain at the new residence and is requesting a Court Order. Ms. Denton's new address has been provided to Adriana Corona, her U.S. Probation/Pretrial Services Officer in California, and Nelson Valenzuela, her U.S.

Probation Officer in the S.D. of Florida. The undersigned has provided the new address, by email to Lindsey Friedman Lazopoulos, Assistant United States Attorney, who is on Maternity Leave.

WHEREFORE, the Defendant, CINDI ELLIS DENTON, respectfully requests that this Honorable Court enter an Order permitting her to remain at her new/changed her address for the reasons stated above.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically filed with the Clerk of Court using CM/ECF, this 9th day of December, 2021.

Respectfully submitted,

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