

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

Plaintiff,

v.

ERIN BROWN FORD,

Defendant.

Case No. 23-mj-5013-JGD-2

**DEFENDANT ERIN BROWN FORD'S
UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE**

Defendant Erin Brown Ford respectfully requests that the Court modify a condition of her pretrial release and allow her to obtain an increase in her credit card limit and to apply for a new cell phone plan which will require a credit check.

In support of this motion, Mrs. Ford states as follows:

1. Mrs. Ford and her husband Wallace Ford were both arrested and charged in this matter. Mrs. Ford was subsequently released on conditions, including a condition requiring that Mrs. Ford “not submit any loan applications absent prior approval from the probation officer.”
2. Pursuant to the relevant release condition, undersigned counsel asked probation to approve Mrs. Ford’s increase in her credit card limit and application for a new cell phone plan, but probation has demurred and directed that Mrs. Ford seek Court approval.
3. Since her release, Mrs. Ford has been a model supervisee and has complied with all release conditions. The increase in her credit card limit and new cell phone plan are

needed to allow the Fords to meet their everyday expenses in the most cost effective way possible.

4. Undersigned counsel has conferred with counsel for the government in this matter, and he does not oppose this motion.

WHEREFORE, Mrs. Ford respectfully requests that this Court ALLOW this motion and modify the conditions of her release to allow her to obtain an increase in her credit card limit and to apply for a new cell phone plan which will require a credit check.

Respectfully Submitted,

ERIN BROWN FORD

By her attorney,

/s/ Joan M. Griffin

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April 14, 2023

CERTIFICATE OF SERVICE

I hereby certify that the above document was served on all parties of record by ECF filing on April 14, 2023.

/s/ Joan M. Griffin

Joan M. Griffin