

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 4:24-cr-00029-BP
	)	
	)	
ROXANNE NAZIR	)	
	)	
Defendant.	)	

**DEFENDANT’S UNOPPOSED MOTION
TO MODIFY CONDITIONS OF RELEASE**

COMES NOW undersigned counsel, Matthew T. Merryman, on behalf of the Defendant Roxanne Nazir (“Defendant”), and requests this Court to modify the conditions of release to allow the Defendant to apply for an automotive loan.

SUGGESTIONS IN SUPPORT

1. On February 6, 2024, Roxanne Nazir was named along with ten co-defendants in a thirteen count Indictment alleging conspiracy to commit wire fraud.
2. On February 26, 2025, the Court set Conditions of Release, which ordered Defendant to not incur new debit or open new lines of credit without court approval. (Dkt. No. 22).
3. On October 3, 2024, the Defendant changed her plea to guilty on Count VI of the Indictment.
4. The Defendant’s sentencing is scheduled for April 3, 2025.
5. The Defendant has been experiencing problems with her automobile and needs to purchase a new vehicle.

6. The Defendant needs an automotive loan in order to purchase a new vehicle and respectfully requests this Court to modify the conditions of release to allow the Defendant to obtain a loan in order to purchase a new vehicle.

7. On February 25, 2025, Counsel conferred with AUSA Paul Becker and the United States of America does not oppose this request for a modification of the conditions of release.

8. This Unopposed Motion to Modify Conditions of Release is made in good faith and not to burden or unduly delay the Court or United States of America.

WHEREFORE, Counsel for Defendant respectfully requests that this Court modify conditions of release as outlined above in order to allow the Defendant to obtain an automotive loan in order to purchase a new vehicle.

Dated: February 25, 2025

THE BATES & MERRYMAN LAW FIRM LLC

/s/ Matthew T. Merryman

Matthew T. Merryman

The Bates & Merryman Law Firm LLC

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CERTIFICATE OF SERVICE

I hereby certify that on February 25, 2025, a copy of the foregoing Defendant's Unopposed Motion to Modify Conditions of Release, was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access the filing through the Court's Electronic Case Filing System.

/s/Matthew T. Merryman

Matthew T. Merryman