

1 GREGORY J. BLOTNICK
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5 UNITED STATES DISTRICT COURT
6 DISTRICT OF NEW JERSEY

7
8 UNITED STATES OF AMERICA

Case No.: 2:21-CR-00796-BRM-1

9 vs.

10 GREGORY J. BLOTNICK

**DEFENDANT’S REPLY TO
GOVERNMENT’S OPPOSITION**

11
12
13 Date: April 23, 2026

14
15 Defendant Gregory J. Blotnick, proceeding pro se, respectfully submits this reply to the
16 Government’s response in opposition to his motion for early termination of supervised release.
17

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19 The Government raises two objections: the plea agreement waiver and the lack of new or
20 unforeseen circumstances.
21

22
23 I recognize the Government’s position regarding *United States v. Damon*, but I believe the
24 “interest of justice” is best served by following the recommendation of the U.S. Probation Office.

25 The Government has confirmed that Probation does not oppose my request and agrees that I have
26 met all requirements for early termination. (Gov’t Resp. at 2). Probation’s firsthand assessment
27 of my conduct and rehabilitation deserves significant weight.
28

1 The Government argues that I have not shown “extraordinary” circumstances. However, under
2 *United States v. Melvin*, this Court is not required to find “extraordinary” or “unforeseen” events
3 to grant relief. The law simply asks if termination is in the “interest of justice” based on the
4 defendant’s conduct.
5

6
7 My conduct over the last 13 months supports that standard: no violations, restitution payments
8 in excess of the court-ordered minimum, active community involvement, stable employment and
9 housing, and a new career path entirely unrelated to my prior offense. Additionally, my employer
10 has been explicit in that the inability to travel on short notice puts me at a disadvantage; early
11 termination would remove this professional barrier and allow access to senior-level opportunities.
12

13
14 The Government’s opposition focuses almost entirely on my past offense conduct. While I take
15 full responsibility for my past, the purpose of § 3583(e)(1) is to evaluate my current performance.
16 I have proven that I am rehabilitated, I pose no risk to the public, and continued supervision no
17 longer serves the interests of justice.
18

19
20 For these reasons, I respectfully request that the Court grant my motion for early termination.
21

22
23 Date: April 23, 2026

Respectfully submitted,

24 /s/ Gregory J. Blotnick
25 GREGORY J. BLOTNICK, Pro Se
26 345 Banyan Blvd #913
27 West Palm Beach, FL 33401

28 *Cases Cited:*

- (1) *United States v. Damon*, 933 F.3d 269 (3d Cir. 2019)
(2) *United States v. Melvin*, 978 F.3d 49 (3d Cir. 2020)

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CERTIFICATE OF SERVICE

I, Gregory J. Blotnick, Defendant pro se, certify that on April 23, 2026, I served a true and correct copy of this reply upon the following parties via electronic mail:

Fatime Meka Cano, Assistant U.S. Attorney

fatime.cano@usdoj.gov

Probation Officer Danielle Caron

danielle_caron@flsp.uscourts.gov

Date: April 23, 2026

/s/ Gregory J. Blotnick
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11

**[PROPOSED] ORDER FOR EARLY
TERMINATION OF SUPERVISED
RELEASE**

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13
14 **GOOD CAUSE APPEARING**, and upon consideration of Defendant's motion for early
15 termination of supervised release,
16

17 **IT IS** on this ____ day of _____, 2026,

18 **ORDERED** that Defendant Gregory J. Blotnick's request for early termination of his
19 period of supervised release is hereby **GRANTED**.
20

21
22 HON. BRIAN R. MARTINOTTI
23 United States District Judge
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