

Case No. 1:21-cr-00188-RBJ-1 (21CR188)

Motion TO TERMINATE SUPERVISED RELEASE AFTER COMPLETION OF TWENTY NINE MONTHS of THIRTY SIX MONTHS supervision SENTENSE

Pursuant title 18 U.S.C. § 3583(e)(1)

ANTONY I. ZAGHAB, Case No. 1:21-cr-00188-RBJ-1 (21CR188)

Honorable Judge R. Brooke Jackson

I would like to submit my request for early release from probation. I am eligible at this time as I served Twenty Nine Months (almost 80%) out of the Thirty Six Months sentence in addition to in prison time ; I am nearing the end of my sentence, I am the right candidate for early release for many reasons including, but not limited to;

- 1) I have successfully served with no violations including full compliance of supervision.
- 2) I have been paying my restitution payments in accordance with the payment plan and my restitution remaining balance should be half or close to half the original amount.
- 3) I am in a stable community including my residence, family and employment.
- 4) I have no history of violence.
- 5) I have Zero Infractions from the time I went to prison to the time during supervision and no recent arrests or convictions or ongoing uninterrupted patterns of criminal conduct
- 6) I have no psychiatric episodes
- 7) I have no drug or alcohol abuse.
- 8) I pose no risk to the safety of any victims (tax payers).
- 9) I am no risk to public safety.
- 10) During my time in prison, I was a model prisoner according to my case manager; I followed the rules and did what my case manager asked me to do and stayed out of trouble.
- 11) I will have better jobs options with better pay as currently while I am on probation, many good high pay jobs will hesitate to hire me when they know I am on probation, which will help me pay more on my restitution obligation.
- 12) My probation officer supports this motion.

When evaluating my conduct, criminal history and potential for future crimes, I believe this court can find that my further and continued supervision is not required because I do meet the criteria, as suggested by the U.S. Administrative Office of the Courts, for early termination, which include: "law-abiding behavior, full compliance with the conditions of supervision, and a responsible, productive lifestyle." See **Publication 109, p.37 (1993), U.S. Administrative Office of Courts.**

I am a proud father of four beautiful children. I take care of my children. I come home and fulfill my duties to my family. As proud as I am of my family, is as proud as they are of me. My oldest will be graduating college this December 2025 from the University of Colorado with a psychology major that he chose to seek a job in helping people that need it, he is currently researching becoming a probation officer as he has seen how it helped me through my journey after prison time. My second son is second year Mechanical engineering major at the University of Colorado. And finally my youngest two children aged ten and eight are learning from me and there older brothers how important education is. I am a good family man. I am a good citizen.

I understand and acknowledge that my financial obligation is a possible obstacle to early release, although, as mentioned above, I have been paying my monthly payments in accordance with my payment plan.

With that said, I do have a proposal. I am paying \$100.00 per month towards my restitution. It will be impossible to pay off the entire restitution from now till the end of my probation. It is not my intentions to undermine the Probation Office's goal to collect the monthly restitution from me for the entirety of the 36 months of probation.

Thanks to a generous offer from my sister, if the court will grant me this request, my sister will give me enough money to prepay the remaining probationary months of restitution payments. In other words, if my 36 months of probation will be reduced to 29 months, then my sister will give me 7 month's worth of restitution payments (7 x \$100 = \$700.00). In doing so, the US Probation Office would have satisfied their role towards my obligation of restitution payments. I understand that this is not a payoff or settlement of restitution; it is only to expedite the balance of probation. I offer this in good faith to the court, Probation office and to Assistant U.S. Attorney.

As the Supreme Court has noted:

Title 18 U.S.C. § 3583(e)(1) is the unequivocal provision for ending the term of supervised release without the possibility of its reimposition or continuation at a later time. More progress is reached when a court finds that a defendant's conduct and the interest of justice warrant it, the **court may "terminate a term of supervised release and discharge the person released,"** once at least a year of release time has been served. As of the day this motion is written, I would have served about 80% of my 36 months supervised probation with only 7 months left of it. **This is an addition to the time I finished my prison time with no violations.**

Throughout these last years of dealing with this chapter of my life, I can honestly say that I see a different man when I look in the mirror. My past actions have dramatically cost me allot on the legal and personal levels. If the court does grant this request, I do not see it as an end to my punishment. I will now and forever have this on my record. More so, I will never forget my role to the victims (the tax payers) in this case and to what this has done to my family. It is not possible to demonstrate how sorry I am to what I had done.

However, I also want to look at the positive side of what has come out of this. Although it is in an unfortunate way, it has made me a better man today. I am more conscience now than ever before of my actions. I see now more than ever before the importance of following the law and my family. I appreciate now more than ever before the opportunities that I have before me.

I have successfully noted personal, legal and professional growth reasons why I believe this motion should be granted.

Thank you very much for your time and consideration. I hope and I pray you will grant this motion to terminate supervised probation.

Very Respectfully,



Anthony I. Zaghab

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