IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	**No. 20CR750**
v.	)	
	)	
MILICA SUMAKOVIC,	)	
	)	
Defendant.	)	

DEFENDANT MILICA SUMAKOVIC'S MOTION TO MODIFY CONDITIONS OF BOND

Now comes Defendant, **MILICA SUMAKOVIC**, by and through her attorney, **RICHARD M. BEUKE**, and for her Motion to Modify Conditions of bond, states as follows:

1. Ms. Sumakovic has been charged with wire fraud and money laundering, charges that are pending in this Court.

2. Ms. Sumakovic is currently out on an unsecured bond with the stipulation that she resides with a third party custodian.

3. Ms. Sumakovic's third party custodian has graciously opened his apartment to her, with a few unavoidable caveats.

4. Her third party custodian, Mr. Babba, lives in Chicago, very far north, making traveling to her home office and her attorney's office very difficult.

5. Mr. Babba has a cat and cannot allow Ms. Sumakovic to bring her dog into his apartment, leaving her dog alone for the majority of the day/night.

6. Mr. Babba only has the ability to provide Ms. Sumakovic with a sofa to sleep on. While she is grateful to this Court for granting her bond, and to Mr. Babba for allowing her to stay in his apartment, she has no privacy and the conditions of this living arrangement are far from ideal.

7. Ms. Sumakovic is bound by her lease to her apartment in Elmhurst until June 2023, where she has lived for almost two years.

8. Ms. Sumakovic will continue to be responsible for her $2,500 rent until that time.

9. Ms. Sumakovic respectfully requests that the condition of residing with her third party custodian be lifted so she can return to her home in Elmhurst.

10. Ms. Sumakovic's pretrial officer does not have a problem with the removal of this condition, and her office relays that they have no position on this request.

11. A voicemail was left for the Government but at the time of filing our call has not been returned for their position.

12. Ms. Sumakovic will continue to appear at every court appearance and abide by all conditions set forth by this Honorable Court.

WHEREFORE, it is requested that the conditions of the Defendant's be modified and the stipulation of residing with a third party custodian be removed. .

Respectfully Submitted,

/s/ Richard M. Beuke
Richard M. Beuke,
Attorney for Defendant – Milica Sumakovic

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