IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA	)	
	)	
vs.	)	
	)	CASE # 20-MJ-00821
	)	
HUNTER VANPELT	)	
Defendant	)	
	)	

MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE

COMES NOW the defendant, Hunter Vanpelt, through Counsel, and moves this Court to modify the conditions of the Defendants' pretrial release. Specifically, the defendant requests that the ankle monitor, originally required as a condition of her bond be removed.

1.

Ms. VanPelt was arrested at her home on October 6, 2020 and charged in the above captioned complaint. Subsequent to her arrest, Ms. Vanpelt was released pursuant to an Order Setting Conditions of Release. Included in the conditions of release, was the requirement that Ms. Vanpelt submit to location monitoring via GPS ankle monitor as directed by the Pretrial Services Office, and that she comply with all of the program requirements and instructions.

2.

Ms. Vanpelt is in compliance with all conditions of pretrial release, including the specific requirements connected to the GPS ankle monitor.

While on pretrial release, Ms. Vanpelt has ongoing medical appointments and procedures which are made more difficult (though not impossible) by the presence of the electronic monitor. Specifically, Ms. Vanpelt is scheduled:

1) to undergo a second epidural spine injection (which is in an operating room setting, complicated by the presence of metals on the body),
2) to have follow up visits with her neurologist and bi-weekly physical therapy, and
3) to have an annual mammogram

3.

Ms. VanPelt is 48 years of age, and a mother of two. She is retired military, having served as a Major in the United States Armed Forces reserve component, as a U.S. military helicopter pilot, a commercial airlines jet pilot, and has commanded troops in an Air Traffic Control Unit.

Ms. VanPelt is a graduate of both Harvard University, and Massachusetts Institute of Technology. She has no prior criminal convictions.

She has previously surrendered her passport and cannot leave the country, nor does she have any desire to do so. Most importantly, Ms. VanPelt has been under the supervision of the Pretrial Release Department and has been wearing the ankle monitor for the past two and a half months, and has had no violations of any of the conditions of her pretrial release.

4.

There are sufficient and significant safeguards in place to insure Ms. Vanpelt's return to Court such that this Honorable Court would have no concern that Ms. Vanpelt is a flight risk. Additionally, Ms. Vanpelt's representation by counsel evidences her intention to address the pending charges appropriately.

5.

Defendant prays that the Court consider her request and modify the condition of pretrial release commanding that she be required to wear the referenced GPS ankle monitor.

RESPECTFULLY SUBMITTED, this 21st day of December, 2020.

KEITH ADAMS & ASSOCIATES, LLC

Keith E. Adams
Attorney for the Defendant
Georgia Bar Number 003655

Decatur Court, Suite 602
315 West Ponce de Leon Avenue
Decatur, Georgia 30030
Telephone (404) 373-3653

_/s/ Keith E. Adams ___
Keith E. Adams
Counsel for Defendant

_/s/ Akil Secret ___
Akil Secret
Counsel for Defendant

_/s/ Hunter Vanpelt____
Hunter Vanpelr
Defendant