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. Home incarceration with electronic monitoring out of her third party custodian's apartment has recently been assigned as a condition of her bond.
4. Based on the new stipulation of electronic monitoring, we would respectfully request that Ms. Sumakovic be monitored electronically out of her own apartment, located at 183 N. Addison Avenue, Apartment 304, Elmhurst, Illinois 60126, and eliminate the element of the third party custodian.
5. This has been discussed with AUSA Brian Hayes, and who stated that the Government does not oppose this request.

6. Ms. Sumakovic's Pretrial Officer, Matthew Bonestroo also has no objection to the proposed modifications.

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 and she be allowed to return to her apartment, where she will continue of home incarceration and be monitored electronically out of there.

Respectfully Submitted,

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

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