UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITES STATES OF AMERICA

Criminal Case #26-10030-RGS-JCB

V.

ROSALIE CLEMENT-JACKSON

MOTION TO MODIFY CONDITIONS OF BOND

Defendant Clement-Jackson herein respectfully moves this Honorable Court for a modification of her conditions of bond, ordered by U.S.D.C., Southern District of Florida; specifically, condition #2, that she "[m]ay not travel outside the Southern District of Florida unless otherwise approved by the Court prior to such travel." Ordered by Magistrate Judge Panayotta on 02/09/2026, Criminal Docket #0:26-mj-06063-PAB. Defendant proposes the conditions of bond allow for the defendant to travel via automobile with her son and family from her resident to Tallahassee, Florida.

As reasons therefor, Defendant states that she has need to travel with her son on a college visit to Florida A&M University (FAMU) in Tallahassee, FL, from April 3rd to April 4th, 2026. Defendant and her family plan to depart on Thursday, April 2nd, at approximately 6:00 PM; and, then, depart Tallahassee for their return trip on April 4th at 11:00 AM. The drive is expected to take approximately eight hours.

In support of this motion, Defendant further represents that AUSA Kristen Kearney and Probation Officer Mackenzie Hilaire express "no objection" to the motion.

Respectfully submitted,

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Date: March 27, 2026

CERTIFICATE OF SERVICE

I, Lorenzo Perez, attorney for the Defendant, hereby certify that on this ~~day I served~~ via email a copy of the Defendant's Motion to Modify Conditions of Bond upon the prosecutor(s) and interested parties in this matter.

Date: March 27, 2026

Lorenzo Perez