IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA *

v. * **Criminal Case No. RDB-23-0027**

TOMEKA GLENN *

* * * * * * * * * * * *

CONSENT MOTION TO MODIFY CONDITIONS OF RELEASE

Now comes the defendant, Tomeka Glenn ("Ms. Glenn"), by and through her attorney, Christopher C. Nieto, and moves this Court to modify the conditions of release ordered in Ms. Glenn's pending matter, and in support thereof states as follows:

1. On January 6, 2023, Ms. Glenn appeared in federal court for her initial appearance. The Government was not seeking detention, and conditions of release were fashioned. One of the conditions specifically imposed on Ms. Glenn was that she was subject to electronic home monitoring and is not allowed to leave her residence without prior Court approval.

2. For the past seven months, Ms. Glenn's adjustment to supervision has been satisfactory: she has had no issues with her supervising officer and has complied with all the conditions of her release.

3. Sadly, Ms. Glenn's friend passed away in late July. The family is having the wake and funeral on August 5, 2023, starting at 10am at March Life Tribute Center, 5616 Old Court Road, Windsor Mill. The family also intends to have a funeral repast at the conclusion of the burial at a reception hall from 3-6pm.

4. Ms. Glenn would like to attend this funeral, burial, and repast, but her release conditions prevent her from attending without the Court's intervention. Consequently, Ms. Glenn respectfully requests that the Court modify the conditions of her release for the limited purpose of allowing her to attend this funeral and grieve with her family. Undersigned counsel has spoken with both Assistant United States Attorney Paul Riley and United States Probation Officer Vicky Adams about this request, and neither object.

WHEREFORE, Ms. Glenn respectfully requests that the Court enter the attached Amended Order.

Respectfully submitted,

/s/_____

CHRISTOPHER C. NIETO, #30031
Nieto Law Office
1 North Charles Street, Suite 1301
Baltimore, Maryland 21201
Phone: (443) 863-8189
Fax: (443) 378-5723
Email: cnieto@nietolawoffice.com

CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2023, a copy of Defendant's Motion to Modify, which was electronically filed in this case, was emailed to Paul Riley and Vicky Adams.

/s/_____
Christopher C. Nieto, #30031
Attorney for Ms. Glenn