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 his attorney, Christopher C. Nieto, and moves this Court to modify the conditions of release ordered in Ms. Glenn's pending matter, with the consent of all parties, 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 not allowed to leave her home unless authorized to do so.

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. Consequently, Ms. Glenn respectfully requests that the Court remove the electronic home monitoring restriction that was originally imposed as a condition of her release in lieu of a 9:00pm to 8:30am curfew and submission to GPS location monitoring. She respectfully submits that

the concerns originally held in support of this more onerous restriction have been tempered and allayed by Ms. Glenn's total compliance with her conditions of release for the past seven months.

4. Undersigned counsel has spoken with both Assistant United States Attorney Paul Riley and United States Probation Officer Vicky Adams about this request. Neither party objects to this request.

WHEREFORE, Ms. Glenn respectfully requests that the Court grant this motion and enter the attached Amended Order.

Respectfully submitted,

/s/
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CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2023, a copy of Defendant's Consent 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