IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA *

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

TOMEKA GLENN *

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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, 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. On August 18, 2023, after seven months of compliance with her pre-trial release conditions, Ms. Glenn's supervision was adjusted to allow her to submit to a curfew of 9:00pm to 8:30am in lieu of electronic home monitoring. Her adjustment to this new level of supervision was satisfactory: she had no issues with her supervising officer and complied with all the conditions of her release.

3. After eleven months of compliance with her pre-trial release conditions, Ms. Glenn sought a hearing to modify the conditions of release and remove the curfew restriction. The hearing was conducted before the Honorable J. Mark Coulson on December

7, 2023, during which time United States Pre-Trial Services Officer Vicky Adams, who supervises Ms. Glenn, agreed with this request. Government counsel, however, opposed this modest modification.

4. At the conclusion of the hearing, Judge Coulson modified the curfew but declined to remove that condition of release entirely. However, the Court indicated to the parties that if Ms. Glenn could show continued compliance with this lessened restriction, His Honor would consider removing this condition entirely. Additionally, His Honor instructed counsel to file this motion with his chambers directly as he was well-versed in the arguments from the parties and the history of this pre-trial release.

5. In the past near two months, as well as the aggregate almost thirteen (13) months since her initial arrest, Ms. Glenn has continued to be compliant with the conditions of her release. Undersigned counsel spoke with USPO Adams, who stated that she has no objection to this request; she confirmed that Ms. Glenn has remained in compliance and indicated that location monitoring would not mitigate any risks associated with the case at this point.

6. Undersigned counsel spoke with AUSA Riley regarding this request, and he blanketly objected, indicating that no further loosening of the conditions of release is appropriate.

7. Consequently, Ms. Glenn respectfully requests that the Court remove the curfew restriction that was imposed as a condition of her release. We respectfully submit that the concerns originally held in support of this restriction have been tempered and allayed by Ms. Glenn's total compliance with all her conditions of release throughout the pendency of this case. A proposed order is attached to this filing.

8. In the alternative, since the Government continues to oppose this request, Ms. Glenn would respectfully request a hearing for the Court to rule on this motion. In anticipation of this hearing, undersigned counsel contacted Magistrate Judge Coulson's chambers, who is available on February 8, 2024 at 1:00pm, but the Government has not indicated if this date/time is acceptable for their schedule.

WHEREFORE, Ms. Glenn respectfully requests that the Court grant this motion or, in the alternative, schedule a hearing before Magistrate Judge Coulson at a mutually agreeable time.

Respectfully submitted,

/s/
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CERTIFICATE OF SERVICE

I hereby certify that on January 30, 2024, 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