IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA
CENTRAL DIVISION

UNITED STATES OF AMERICA, Plaintiff, v. JOHN RICHARD STIDOLPH, Defendant.	Case No. 4:21-cr-136 **MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE**

Defendant, John Richard Stidolph, through counsel, moves to modify his conditions of pretrial release. In support of this motion, counsel states:

1. Mr. Stidolph was charged with two counts of wire fraud and four counts of false statements.

2. On June 3, 2022, the defendant pled guilty to all charges, without a plea agreement.

3. Sentencing is set for October 7, 2022, at 9:30 a.m.

4. The defendant has had no violations while on pretrial release and remains on release pending sentencing.

5. The November 3, 2021, order setting conditions of release for Mr. Stidolph includes that he (a) "immediately advise the court or the pretrial services office or supervising officer in writing before any change in address and telephone number; and (b) limit his place of abode, travel, and personal association to the United States. (Docs. 18, 19 at pp.1, 2.)

6. The defendant has a job opportunity in Cheyenne, Wyoming, beginning July 18 and ending August 22, 2022. The job entails building an 18 x 16 room addition to the home of his wife's niece. The residence is located at 3821 Dey Avenue, Cheyenne, Wyoming, and Mr. Stidolph would live at that residence while the addition is added.

7. The defendant seeks this Court's permission to travel to and live in Cheyenne, Wyoming for the July18-August 22, 2022, time period. Mr. Stidolph would be back in Iowa by August 22, 2022.

8. Additionally, Mr. Stidolph's brother will be buried in Basin, Wyoming over the July 29-31, 2022 weekend. Basin is approximately 5 ½ hours from Cheyenne. Defendant would like to attend his brother's service and travel from Cheyenne to Basin on July 29, 2022, returning to Cheyenne on July 31, 2022.

9. The U.S. Probation Office, through Ashley Knight, does not object to this motion.

10. The government, through AUSA Rachel Scherle, does not object to this motion.

WHEREFORE, counsel for the defendant respectfully requests that defendant's pretrial conditions be modified so that he may travel to and live in Cheyenne, Wyoming for employment purposes for the time period of July 18 through August 22, 2022. Additionally, defendant requests permission to travel from Cheyenne to Basin over the July 29-31 weekend to attend his brother's funeral.

Respectfully submitted,

/s/ Andrew Graeve

Andrew Graeve, Asst. Federal Defender
FEDERAL PUBLIC DEFENDER'S OFFICE
400 Locust Street, Suite 340
Des Moines, Iowa 50309-2353
PHONE: (515) 309-9610
FAX: (515) 309-9625
E-MAIL: andrew_graeve@fd.org
ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on June 24, 2022, I electronically filed this document with the Clerk of Court using the ECF system which will serve it on the appropriate parties.

/s/ Theresa McClure