IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA *

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

TOMEKA GLENN *

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

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 has been satisfactory throughout the past three months: 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 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.

4. Undersigned counsel has spoken with both Assistant United States Attorney Paul Riley and United States Probation Officer Vicky Adams about this request. Agent Adams is in support of this modification, but the Government opposes this request. Accordingly, we respectfully request a hearing for the Court to rule on this motion. In anticipation of this hearing, counsel for both Ms. Glenn and the government contacted Magistrate Judge Coulson's chambers, and the parties have agreed to conduct this hearing on Thursday, December 7, 2023, at 10:30am.

WHEREFORE, Ms. Glenn respectfully requests that the Court schedule a hearing for the above-referenced date and time.

Respectfully submitted,

/s/_____
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CERTIFICATE OF SERVICE

I hereby certify that on November 27, 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