

MOTION TO MODIFY CONDITIONS OF RELEASE

U.S. v. Warren Grace
Criminal No. S-02-0220
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allegations. Yesterday, Thursday, June 6, 2002, defendant was informed by Mr. Davis, within hearing distance of other inmates, that the FBI would be picking him up the next day.

4. Both the United States and defense counsel agree that defendant's security at Hope Village has been compromised by the actions of Counselor Davis. Therefore, both parties agree that defendant should be moved out of Hope Village.

5. Hence, the United States respectfully recommends that defendant's conditions of release be modified; and (1) that defendant be placed under 24 hour house; (2) that defendant be placed under electronic monitoring; and (3) that defendant be allowed to leave his house only to meet with FBI agents or his attorney. Both the government and defense counsel understand that the above conditions of release would ensure both the safety of the community and his presence at trial, as well as, safeguard the safety of the defendant.

6. The United States has informed Pre-Trial Services Officers Randy Cannal of this motion. Mr. Cannal stated that the position of the Pre-Trial Services Office remains that defendant should be detained pending trial. However, Mr. Cannal did advise that if the Court were to modify defendant's conditions of release as recommended above, Pre-Trial Services would be able to place defendant under electronic monitoring immediately.

7. This motion was read to Assistant Federal Public Defender Joseph Balter, counsel for the defendant, and he had no objections to the same.

WHEREFORE the United States respectfully requests that the Honorable Court take notice of the foregoing, modify defendant's conditions of release as requested herein, and take

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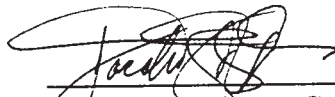
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whatever other action it deems appropriate

RESPECTFULLY SUBMITTED in Baltimore, Maryland this 7th day of June, 2002.

THOMAS M. DIBIAGIO

United States Attorney



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Assistant United States Attorney

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA,

v.

WARREN GRACE,
Defendants.

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FILED ENTERED
LODGED RECEIVED

CRIMINAL NO. S-02-0220

JUN 07 2002

(SEALED)

AT BALTIMORE
SERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND DEPUTY
CRIMINAL


ORDER

Upon motion by the government and there being no objection on the part of defendant,

IT IS HEREBY ORDERED that defendant's conditions of release be modified as follows:

1. Defendant is to be placed under 24 hour house arrest at 2506 Edgecombe Circle North, Baltimore, Maryland 21215;
2. Defendant is to be placed under electronic monitoring by the Pre-Trial Services Office;
3. Defendant shall be allowed to leave his residence to meet with agents from the FBI and/ or his attorney.

SO ORDERED.

 06/07/02
United States District Judge

