

**UNITED STATES DISTRICT COURT
FOR THE
SOUTHERN DISTRICT OF ILLINOIS**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Case No. 3:18 CR 30172 NJR
vs.)	
)	
JACE A. FAUGNO,)	
)	
Defendant.)	

MOTION TO MODIFY CONDITIONS OF RELEASE

COMES NOW, Defendant, Jace Faugno, through his attorney, Mark A. Hammer (“Counsel”), and respectfully requests that the conditions of his pretrial release be modified to allow his participation in the Curfew Location Monitoring Restriction program (“Curfew”).

The motion is made on the following grounds:

- 1) On November 16, 2018, this Court released defendant on an Unsecured Appearance Bond, subject to an Order Setting Conditions of Release [Doc. 24]. Pursuant to Paragraph 7(r), Defendant was to participate in the location monitoring program of Home Detention, with location monitoring technology at the discretion of the officer.

- 2) Defendant has done well on pretrial release and has met all expectations of his pretrial release officer. Counsel spoke with EDMO US Pretrial Services Officer Lauren Gilkeson, who is supervising Defendant regarding Defendant’s proposed motion. Officer Gilkeson in turn reached out to Defendant’s SDIL Pretrial Officer Brenda Tate. The both responded that Defendant is doing well on location monitoring and they have *no objection* to the Court’s modification of Defendant’s conditions of release to Curfew.

3) Counsel also spoke with AUSA Christopher Hoell who, learning of Pretrial Services' position, also stated that he has *no objection* to the Court's modification of Defendant's conditions of release to Curfew.

WHEREFORE, Defendant respectfully requests that the Court modify paragraph 7(r) of its November 16, 2018 *Order Setting Conditions of Release* to permit Defendant's participation in the Curfew restriction program, as provided in paragraph 7(r).

Respectfully submitted,

/s/ Mark A. Hammer

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CERTIFICATE OF SERVICE

I certify that, on May 16, 2019, a copy of this document was electronically filed with the Clerk of Court, and served on all counsel of record, by the CM-ECF system.

/s/ Mark A. Hammer

Mark A. Hammer