

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
TIMOTHY JASON KRIPNER,)
)
Defendant.)

Case No. 06-CR-538-JH-LAM

UNOPPOSED MOTION FOR MODIFICATION OF TERMS OF PRETRIAL RELEASE

COMES NOW, Timothy Kripner, Defendant in the above-entitled case, and respectfully moves this Court for a modification of the terms of his pretrial release, and in support of this motion shows as follows:

1. Defendant is currently on pretrial release and living in the state of Arizona pending the trial of co-Defendants against whom he has and will again testify.
2. Trial on this matter was originally set for May of 2007, but has been continued.
3. Defendant is currently on home incarceration, and his performance on pretrial release thus far has been exemplary.
4. Defendant is the father of a newborn, and his home incarceration status is restricting the family's finances.
5. Defendant is respectfully requesting from this Court a modification of his pretrial release to allow him to leave his home during work hours so as to work in a sheet metal factory, a location at which he has already secured employment.
6. Pretrial Services Officer David Venegas indicated on May 17, 2007 that he did not oppose this motion. Assistant U.S. Attorney Luis Martinez indicated on June 5, 2007 that he did not oppose this motion.

