

9

IN THE
UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)

Plaintiff,)

vs.)

THOMAS JOHNSON,)

Defendant.)

FILED

AUG 18 2005

LAL

No. 02 CR 1050

Hon. James B. Zagel

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

AGREED MOTION TO EXPAND CONDITIONS OF RELEASE

THOMAS JOHNSON, by his attorney, Keri A. Ambrosio, requests that the Court expand the conditions of his pretrial release to allow travel outside the Northern District of Illinois for employment purposes. In support, Mr. Johnson submits the following:

- (1) Mr. Johnson has been in compliance with the conditions of release imposed on April 25, 2005.
- (2) ZMX Transportation has offered Mr. Johnson a position as a truck driver. The position would require travel within a three-hundred mile radius of ZMX headquarters, in Brookfield, Illinois.
- (3) Mr. Johnson requests that the Court enlarge his traveling condition to include surrounding states for employment purposes.
- (4) Pretrial Services Officer Jennifer McCauley supports the request and has proposed that Mr. Johnson familiarize the pretrial services office with his


itinerary upon assignment.

(5) Assistant United States Attorney Mitchell Mars does not object to Mr. Johnson's request.

WHEREFORE, THOMAS JOHNSON respectfully requests that the Court enlarge the traveling condition of his pretrial release, and allow travel for employment purposes outside the Northern District of Illinois.

DATE: August 16, 2005

Respectfully submitted,

By: 
KERI A. AMBROSIO,
Attorney for Thomas Johnson