

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>Case No: 21-CR-28 (APM)</b>
	:	
<b>JOSHUA JAMES,</b>	:	
<i>Defendant</i>	:	

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**DEFENDANT’S CONSENT MOTION TO MODIFY CONDITIONS OF PRETRIAL  
RELEASE**

The Defendant, Joshua James, by undersigned counsel, respectfully moves this Honorable Court to modify the conditions of his release relating to internet use. Government counsel consent to this request. In support of this motion, Mr. James states as follows:

1. The Order releasing Mr. James to home incarceration prohibits him from accessing the internet. The relevant condition states:

GPS Monitoring: Defendant is not to have any access to computers, smart phones, tablets, or any device that would allow him [or her] to communicate through either encrypted or non-encrypted applications.

2. After consultation, Government counsel and counsel for Mr. James consent to a Modification of the Release Order as follows:

The defendant may use an electronic device with internet access for the sole purposes of: (1) attending court hearings, (2) communicating with his counsel and defense team, and (3) reviewing discovery materials with counsel and defense team. The defendant may not use electronic devices connected to the Internet for any other purposes.

3. This Court recently granted an identical request to amend conditions of release by co-defendants Thomas Caldwell, Donovan Cowl, Graydon Young, Laura Steele and Connie Meggs.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
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Joan C. Robin  
Virginia Bar No. 44502  
Law Office of Joni C. Robin, PLLC  
114 North Alfred Street  
Alexandria, Virginia 22314  
Ph: 703-349-1111  
Fax: 571-279-6851  
[joni@jonirobinlaw.com](mailto:joni@jonirobinlaw.com)

\_\_\_\_\_/s/\_\_\_\_\_  
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Christopher Leibig, Esq.  
Virginia Bar No. 40594  
Counsel for Defendant  
114 N. Alfred Street  
Alexandria, Virginia 22314  
(703) 683 4310  
[chris@chrisleibiglaw.com](mailto:chris@chrisleibiglaw.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on the 19th day of April, 2021, I will electronically file the foregoing Notice with the Clerk of Court using the CM/ECF system, which will then send a notification of said filing (NEF) to counsel of record.

\_\_\_\_\_/s/\_\_\_\_\_  
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Joan Robin