

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA .

v. .

Criminal No. SAG-22-225

SUPREME JONES .

**MOTION TO MODIFY RELEASE CONDITIONS
TO REMOVE CURFEW AND LOCATION MONITORING CONDITIONS**

Mr. Supreme Jones, by his undersigned counsel, hereby moves this Honorable Court to modify release conditions to remove the conditions of residence curfew and location monitoring. Pretrial Services consents to this request; the Government objects. In support of Mr. Jones' request, the Defense states as follows:

Mr. Jones' compliance history on release conditions:

1. Mr. Jones is a veteran of the United States Air Force and former officer with the Baltimore Police Department. The charges in this case stem from his immediate previous employment as a Customs and Border Patrol (CBP) officer at the Baltimore-Washington International Airport (BWI). He is charged by indictment with two counts of entering an aircraft or airport area in violation of security requirements under 49 U.S.C. §§ 46314(a), (b)(2) on or about February 21, 2022, and April 5, 2022. Dkt 1, Indictment. It is alleged that Mr. Jones used his BWI security badge to bypass required security checkpoints. Mr. Jones was suspended from his CBP employment following the charges.
2. On June 27, 2022, Mr. Jones had his initial appearance and was released on conditions with minimal restrictions. Dkt. 11, Order Setting Conditions of Release. Due to the Government's concerns that Mr. Jones may have boarded aircraft during his employment tenure while armed but failed to follow requisite firearm declaration procedures at times, the Court included a

condition restricting Mr. Jones from air travel while armed or seeking to travel while armed. Dkt. 11.

3. Following his employment suspension from CBP, Mr. Jones relocated to Atlanta, Georgia to reside with his wife, who was pregnant with their child. Mr. Jones had previously traveled frequently between Baltimore, Maryland; Atlanta, Georgia; and Charlotte, North Carolina, where his other child – a young daughter – resides with her mother.
4. Under courtesy supervision by Pretrial Services in the Northern District of Georgia, Mr. Jones remained compliant with conditions for months.
5. Then, on October 8, 2022, Mr. Jones was involved in a car accident in the early morning hours in Clayton County, Georgia. It is alleged that Mr. Jones was under the influence of alcohol at the time and claimed to the other driver and responding law enforcement that he, Mr. Jones, was a law enforcement officer. At the time of the accident, Mr. Jones was driving a vehicle equipped with police lights that contained a uniform shirt, radio, and “Baltimore Police” velcro patch. Mr. Jones was charged by the Clayton County Police Department with several Georgia traffic offenses, including: DUI-Alcohol, less safe, under Ga. Code Ann. § 40-6-391(a)(1); failure to yield the right of way when turning left, § 40-6-71; and unlawful use of blue lights, § 40-8-90. The charges remain pending.
6. Due to the alleged October 8, 2022 conduct, Pretrial Services recommended a variety of modifications to release conditions, to which the parties agreed. On October 14, 2022, release conditions were modified to include alcohol and drug prohibition, testing for prohibited substances, participation in any recommended treatment, and the addition of a location monitoring program to include a residential curfew restriction (from 10:00 p.m. until 6:00 a.m.), the surrender of any law enforcement vestiges in Mr. Jones’ possession, and the removal

of “blue lights” from his car. Dkt. 21, Modification of Release Conditions.

7. Mr. Jones complied fully with the more stringent release conditions for over six months. In addition to adhering to Pretrial conditions, he has maintained employment and helped care for his second child, who was born in the fall.
8. The one other alleged Pretrial violation occurred several months ago. On April 22, 2023, Mr. Jones was issued two traffic citations in his home county in Georgia for (1) speeding, and (2) a safety belt violation. He promptly paid the citation penalty fees of \$113.00 on April 27, 2023 (as Pretrial verified) but failed to report his contact with law enforcement for the traffic infractions to his supervising officer. When his Northern District of Georgia Pretrial Officer questioned him about the incident, Mr. Jones acknowledged the law enforcement contact and traffic violations. Pretrial notified this Court of the apparent violation on May 8, 2023 and recommended “no court action” regarding the alleged violations of release conditions.
9. Mr. Jones has since remained compliant with conditions and now requests that his release conditions be modified.

Request for modification:

10. Mr. Jones has now been on release for over a year with his federal case set for trial on November 6, 2023.
11. Having lost his employment as a CBP officer, he regained employment in the sports industry as a referee. It is counsel’s understanding that he has had to forgo work opportunities that require overnight remote travel for athletic game expositions due to his location monitoring-curfew requirements. He has also experienced impediments to visiting his young daughter in North Carolina for the same reasons.
12. At this point, the curfew and location monitoring conditions are more restrictive than necessary

to reasonably assure community safety under the Bail Reform Act. 18 U.S.C. § 3142(c)(1)(B) (requiring court to subject person to “least restrictive” conditions court determines will reasonably assure court appearance and community safety). It is the Defense’s position that the remaining conditions, including an alcohol prohibition and continued testing for prohibited substances, sufficiently assure community safety.

13. Due to his overall lengthy compliance with the modified release conditions, Mr. Jones requests the removal of the residential curfew and location monitoring conditions. Pretrial Services for the District of Maryland and the Northern District of Georgia have conferred, and based on Mr. Jones’ compliance, Pretrial Services in both districts have no objection to this request.
14. The Government objects to removing the curfew and location monitoring conditions while Mr. Jones’ October 2022 charges in Georgia remain pending. Defense counsel’s last communication with the law office representing Mr. Jones on the Georgia charges revealed that cases in that local county take an exceedingly lengthy time to resolve.
15. If the Court is not inclined to order the removal of the curfew and location monitoring conditions, the Defense requests that the Court grant Pretrial Services the authority to approve additional leave from the residence, including but not limited to leave for employment and family obligations requiring travel outside Georgia.

WHEREFORE, with the consent of Pretrial Services and noting the Government’s objection, Mr. Jones moves this Court to modify release conditions to remove the conditions of curfew and location monitoring. A proposed order is attached.

Respectfully submitted,

/s/

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ORDER ON MOTION TO MODIFY RELEASE CONDITIONS

For the reasons stated in the Defense’s Motion to Modify Release Conditions to Remove Curfew and Location Monitoring Conditions, and noting Pretrial Services’ consent and the Government’s objection thereto, it is this ____ day of July, 2023, hereby

ORDERED that the Motion is GRANTED; and it is further

ORDERED that the conditions of location monitoring and curfew restriction are removed;
and it is further

ORDERED that all other release conditions remain in full force and effect.

HONORABLE BETH P. GESNER
United States Magistrate Judge