

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA,)	CRIMINAL ACTION NO.
)	
Plaintiff,)	3:13-CR-00417-M-1
)	
v.)	
)	
XXXX XXXX,)	
)	
Defendant.)	
)	

MOTION FOR EARLY TERMINATION OF SUPERVISED RELEASE

Defendant, XXXX XXXX, hereby moves this Court, pursuant to 18 U.S.C. § 3583(e)(1), to terminate his supervised release. In support of this motion, Mr. XXXX sets forth the following facts and argument:

1. On December 11, 2014, this Court sentenced Mr. XXXX to forty-two months imprisonment and two years supervised release in this case.
2. Mr. XXXX was released from the Bureau of Prison’s custody on March 1, 2017 to begin his two year term of supervised release.
3. 18 U.S.C. § 3583(e)(1) provides that a court may terminate a defendant’s supervised release at any time after the defendant has served at least one year of a supervised release sentence.
4. Undersigned counsel recently received a telephone call from United States Probation Officer Eric Christiansen from the District of Nevada informing counsel that the United States Probation Department did *not* oppose early termination of Mr. XXXX’s supervised release. Undersigned counsel later confirmed the identify and position of Mr. Christiansen by contacting him directly through the main telephone number for the Las Vegas office of the United States Probation Department for the District of Nevada.

5. The government has also spoken with Mr. Christiansen and, according to the government, Mr. Christiansen confirmed the fact that he did not oppose the termination of Mr. XXXX's supervised release.

6. Since being placed on supervised release Mr. XXXX has complied with all of the conditions of that supervised release. Mr. XXXX has maintained total sobriety and has been focused on rebuilding his life and taking care of his son. Mr. XXXX has been dedicated to the care and support of his son, who has been diagnosed with autism. Moreover, Mr. XXXX is actively involved in his son's after school programs and his schooling.

7. Mr. XXXX is employed full time as a manager at a Las Vegas business named Waffelato. The company owns ice cream shops and cafes and is expanding to open bistros. Mr. XXXX is responsible for developing business concepts for the company.

8. The government has stated that they will defer to the probations officer's opinion on this matter.

WHEREFORE, XXXX XXXX, respectfully requests this Court to terminate his supervised release.

Respectfully submitted,

/s/ F. Clinton Broden
F. Clinton Broden
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Attorney for Defendant
XXXX XXXX

CERTIFICATE OF CONFERENCE

I, F. Clinton Broden, certify that I conferred on the above motion with Michael Beckwith, counsel for the United States, and I was told:

THE GOVERNMENT WILL DEFER TO THE PROBATION OFFICER'S OPINION ON THIS MATTER.

/s/ F. Clinton Broden
F. Clinton Broden

CERTIFICATE OF SERVICE

I, F. Clinton Broden, certify that on April 27, 2018, I caused the foregoing document to be served by electronic means on all counsel of record.

/s/ F. Clinton Broden
F. Clinton Broden

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ORDER

Upon consideration of Defendant's Motion for Early Termination of Supervised Release, said motion is this ____ day of _____, 2018 GRANTED.

ORDERED pursuant to 18 U.S.C. § 3583(e)(1), Defendant's term of supervised released imposed in this case is hereby terminated.

BARBARA M.G. LYNN
Chief United States District Court Judge