

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ARMIN HARCEVIC

Defendant.

Cause No. 4:15-CR-0049 CDP- DDN

DEFENDANT'S MOTION TO MODIFY CONDITIONS OF RELEASE

Comes now Defendant Armin Harcevic, by and through his counsel Charles Swift, and hereby requests this Court enter an order modifying the conditions of release, to allow Defendant to seek employment and to allow Defendant call his mother in Bosnia. In support thereof, Defendant states as follows:

1. The Order Setting Conditions of Release [Doc. 153] was entered on March 13, 2015.
2. Defendant secured bail and is currently being supervised by the U.S. Pretrial Services Office.
3. Defendant is fully compliant with the conditions of release.
4. Defendant now seeks a modification of this Court's order, specifically Condition Numbers 9 and 9(w), to allow Defendant to seek employment and to allow Defendant call his mother in Bosnia.
5. Defendant is the primary provider for his family but is currently unemployed. Defendant is confined to his home and monitored by a GPS device; however, he is allowed out of

his home for certain limited purposes, such as meetings with his attorney, worship and other activities approved by Pretrial Services.

6. Defendant is without income, having to rely upon the charity of others. Prior to the indictment, Defendant had been employed as a contractor.
7. Defendant has a business license. A neighbor's friend has asked for help remodeling a bathroom and for an estimate.
8. The Conditions of Release relative to home detention do allow Defendant to leave the home for employment; however, the Court's order is ambiguous as to whether Defendant may in fact seek employment and be employed outside of his home. Due to the nature of contracting work, Defendant must leave the home to meet with clients, provide estimates, purchase building materials with clients, and contract with workers.
9. Defendant has consulted with a Pretrial Services officer, William Irvy, who has advised him to seek a court order to allow him to seek employment.
10. This Court recently granted a similar motion for Defendant Sedina Unkic Hodzic.
11. Defendant also seeks permission to call his mother in Bosnia. His mother's name is Ifeta Huzejrovic, and she resides in Sarajevo, Bosnia. Her phone number is 387-619-1625. In accordance with Condition 9(w) of the Order Setting Conditions of Release, Defendant is seeking permission to call his mother in Bosnia.
12. Defendant has not spoken with his mother since he was arrested. His mother is 58 years old, and she has no immediate family in Bosnia.
13. The Government by Assistant U.S. Attorney Matthew Drake, does not object to allowing Mr. Harcevic to call his mother in Bosnia, but does object to modifying the conditions of release so that he may seek employment.

WHEREFORE, for the foregoing reasons Defendant requests this Court enter an order modifying his conditions of release to allow him to seek employment and to call his mother in Bosnia.

Dated this 25th day of August, 2015

/s/ Charles D. Swift

Charles D. Swift
Pro Hac Attorney for Armin Harcevic
833 – E. Arapaho Rd., Suite 102
Richardson, TX 75081
Phone (972) 914-2511
Fax (972)692-7454
cswift@clcma.org

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of defendant Harcevic's Motion to Modify Conditions of Release was electronically filed and served on the Court's electronic filing system:

DATED this 25th day of August, 2015.

/s/ Charles D. Swift

Charles D. Swift
Pro Hac Attorney for Armin Harcevic
833 – E. Arapaho Rd., Ste. 102
Richardson, TX 75081
Tel: (972) 914-2507
Fax: (972) 692-7454
cswift@clcma.org