

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	
)	
RAMIZ ZIJAD HODZIC,)	
a/k/a Siki Ramiz Hodzic,)	
)	Cause No. 4:15-CR-0049 CDP- DDN
SEDINA UNKIC HODZIC,)	
)	
NIHAD ROSIC,)	
a/k/a Yahya AbuAyesha Mudzahid,)	
)	
MEDIHA MEDY SALKICEVIC,)	
a/k/a Medy Ummuluna,)	
a/k/a Bosna Mexico,)	
)	
ARMIN HARCEVIC, and)	
)	
JASMINKA RAMIC,)	
)	
Defendants.)	

**GOVERNMENT'S RESPONSE TO DEFENDANT HARCEVIC'S MOTION FOR
MODIFICATION OF CONDITIONS OF RELEASESE**

Comes now, the United States of America, by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and Matthew T. Drake, Howard J. Marcus, and Kenneth R. Tihen, Assistant United States Attorneys for said District, and Mara Kohn, Trial Attorney for the United States Department of Justice and respectfully responds to Defendant Armin Harcevic's Motion to Modify Conditions of Pretrial Release.

On February 5, 2015, the United States filed a Motion requesting Pre Trial Detention of Defendant Harcevic. Various court appearances and hearings were held in the Northern District

of California concerning the matter. A hearing was held in this District on April 7, 2015, wherein the Court heard argument concerning pretrial detention and release matters. Subsequent to posting a bond set by the Court, on April 30, 2015, this Court entered an Order Setting Conditions of Release concerning Defendant Harcevic. (Doc. #. 153) The Court ordered Defendant Harcevic released subject to numerous conditions. Pursuant to the Court's Order, the defendant was placed in the custody of three third parties. Additionally, and according to Condition 9(b), the defendant was not ordered to seek employment. In Condition 9(p)(ii), Defendant Harcevic was ordered restricted to his residence at all times except for employment; education; religious services; medical, substance abuse, or mental health treatment; attorney visits; court appearances; court-ordered obligations; or other activities approved in advance by the pretrial services office or supervising officer.

On August 25, 2015, Defendant Harcevic filed his instant Motion requesting modification of the conditions of release. (Doc. # 194) Defendant Harcevic requested permission to: (1) seek employment and, (2) allow Defendant Harcevic to telephone his mother in Bosnia. In his Motion the defendant accurately stated that, following discussions between the parties, the United States does not object to allowing Defendant Harcevic to telephone his mother in Bosnia. However, the United States does object to modifying the conditions of release so that Defendant Harcevic may seek employment outside the home.

As a basis for objection, the United States relies on reasons and assertions set forth in the Motion for Detention as well as arguments presented to this Court on or about April 7, 2015. As an additional basis, the United States also refers to the facts and circumstances presented in the Pre Trial Service Reports previously prepared, and which were addressed with this Court.

Based on those arguments and factors previously identified, the United States believes that, in this case, Defendant Harcevic's employment outside the home as a private, self-employed building contractor for purposes described in the motion would be inappropriate.

Respectfully submitted,

RICHARD G. CALLAHAN
UNITED STATES ATTORNEY

/s/ Matthew T. Drake
Matthew T. Drake – 46499MO
Assistant United States Attorney

CERTIFICATE OF SERVICE

I certify that on September 9, 2015, a true and correct copy of the foregoing Government's Response to Motion for Modification of Conditions of Release was served on the Court's electronic filing system.

/s/ Matthew T. Drake

Matthew T. Drake – 46499MO
Assistant United States Attorney