

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 19-80030-CR-DIMITROULEAS

UNITED STATES OF AMERICA

vs.

AARON SINGERMAN,

Defendant.

**GOVERNMENT'S MOTION TO REVOKE BOND CONDITIONS
AND REQUEST FOR EXPEDITED CONSIDERATION THEREOF**

The United States, by and through undersigned counsel, respectfully files this motion to revoke the defendant's bond conditions pending sentencing, and requests that the Court expedite the consideration thereof, and permit government counsel to appear by Zoom to ensure an expedited hearing.

Probation has sent the Court and the parties a Violation Memorandum and Request for Show Cause Hearing of January 10, 2022. Based on that report and conversation with the Probation Officer, the government is concerned about the defendant's escalating irresponsible and dangerous behavior. The defendant pleaded guilty on November 17, 2021 to Counts 3 and 4 of the Indictment, and faces up to 13 years' imprisonment at sentencing on January 27, 2022. In less than two months since he pleaded guilty, the defendant has had two incidents while under the influence. First, in November 2021, the defendant was arrested for Boating Under the Influence. His driver's license was suspended as a result of that arrest, and compliance with that new restriction on his Florida driving privileges was added to his bond conditions. On January 7, 2022, in flagrant violation of this Court's order and Florida law, and with total disregard for public safety, the defendant illegally

drove a car, while admittedly under the influence of sleeping medication, and had a car accident. He has received new citations for careless driving and driving with a suspended license as a result.

The defendant appears to have a substance abuse problem, and his behavior is spiraling downward as he approaches his sentencing date. Clearly, defendant's recent conduct shows that defendant could harm others or himself before his sentencing on January 27, 2022. While the sentencing is two weeks away, it is apparent that the current conditions of his release are insufficient, and that the safety of both the public and the defendant are at immediate risk.

The government requests that the defendant's bond be immediately revoked and that he be ordered held without bond pending sentencing. The defendant's conduct precludes a finding by clear and convincing evidence that he is not likely to pose a danger to the safety of any other person or the community if he continues to be on personal recognizance. 18 U.S.C. § 3143.

Furthermore, in order to expedite the consideration of this motion, undersigned counsel request that the Court allow government counsel to appear by Zoom at any hearing which the Court might set on this motion.

Date: January 11, 2022

Respectfully submitted,

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CERTIFICATE OF CONFERENCE (L.R. 88.9(a))

I hereby certify that the government has conferred with James Durham, counsel of record for the defendant. Mr. Durham has advised that he is opposed to this motion.

Stephen J. Gripkey
Stephen J. Gripkey
U.S. Department of Justice