

NORTH CAROLINA

FILE NO(S): _____

GUILFORD COUNTY
Greensboro Division

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION

THE STATE OF NORTH CAROLINA)
)
)
Vs.)
)
)
)
_____,)
Defendant.)

MOTION
TERMINATE ELECTRONIC
MONITORING

THIS MATTER COMING on before the undersigned Judge on motion for entry of an order; AND IT APPEARING that defendant is on pre-trial release and a condition of his bond is Greensboro Police Department Electronic Monitoring (GPD GEM Monitoring). Defendant, by and through undersigned counsel, alleges the following:

- 1) The defendant has been on electronic monitoring since date of arrest in 2019 and has been compliant with his curfew and monitoring as well as has been proactive about obtaining travel passes when necessary.
- 2) Pretrial electronic monitoring is actually punitive and requires compliance with a strict curfew and Defendant has had to comply with these restrictions for nearly 18 months.
- 3) Defendant is presumed innocent and has suffered excessive pretrial punishment despite not having been convicted of the above offenses.
- 4) Defendant has extensive contacts in the Guilford community and co-owns a business involved in lawn care.

Defendant respectfully requests that his electronic monitoring be terminated as a wholly unnecessary condition of his pretrial release.

Date

A Brennan Aberle
Aberle & Wall, LLC
Attorney for Defendant