**STATE OF ILLINOIS )**

**) SS**

**COUNTY OF COOK )**

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS**

**COUNTY DEPARTMENT – CRIMINAL DIVISION**

PEOPLE OF THE STATE OF ILLINOIS )

)

v. ) No. XXXXX

)

XXXXXXXX )

**MOTION TO AMEND CONDITIONS OF BOND**

NOW COMES the Defendant, XXXXXX, by his attorney, AMY CAMPANELLI, **XXXXXXXXX**, and respectfully moves this Honorable Court to strike the condition of electronic monitoring and grant him a recognizance bond pursuant to 725 ILCS 5/110-4, 5/110-5, for the following reasons:

1. Defendant was arrested on XXXXXXXX and was charged with driving while license suspended/revoked (625 ILCS 5/6303(a)). He was given an I-bond out of the police station.
2. On XXXXXXXX, an agreement was reached between the Assistant State’s Attorney and the defendant for him to serve 60 days on electronic home monitoring, and subsequently plead guilty.
3. On XXXXXXXX, Mr. XXXXXX appeared in court to surrender. As is common practice, after hearing our agreement, the judge increased Mr. XXXXXX bond to $10,000 IEM. He surrendered to the sheriff’s office and was transported to 26th and California to be fitted with an ankle monitor. A date of **XXXXXXXXX** was agreed upon for Mr. XXXXXX to return to court and enter a plea of guilty, with an expected sentence of 60 days time considered served/time actually served.
4. Due to the COVID-19 virus, most courtrooms are closed, including the Traffic Division. Mr. XXXXXX will therefore be unable to appear in court on **XXXXXXXXX**.
5. Mr. XXXXXX has remained on electronic monitoring and complied with all of the program conditions since February 10, 2020.
6. If the condition of electronic monitoring is not removed immediately, Mr. XXXXXX will be forced to remain on electronic monitoring until at least May 31, 2020—much past the originally agreed upon 60 days.
7. If the condition of electronic monitoring is removed immediately, Mr. XXXXXX can appear in court on a subsequent date and enter his guilty plea.

WHEREFORE, the Defendant respectfully request that this Honorable Court enter an Order removing the condition of Electronic Monitoring, or provide any other relief the Court deems fair and just.

Respectfully submitted,

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**XXXXXXXXX**