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March 5, 2019

VIA EMAIL AND FEDEX

Helen Krapels, Esq.
General Counsel
United States Parole Commission
90 K Street, NE
Third Floor
Washington, D.C. 20530

Re: Jonathan J. Pollard, Register No. 09185-016

Dear Ms. Krapels:

We are counsel to Jonathan J. Pollard. On November 20, 2015, Mr. Pollard was released from the custody of the Bureau of Prisons to the custody of the United States Parole Commission (the "Commission") and the U.S. Probation Department for the Southern District of New York (the "Probation Office"). We write to respectfully request that the Commission and Probation Office remove or at least substantially relax the special conditions of Mr. Pollard's parole.

Pursuant to the Commission's Notice of Action dated March 2, 2016, Mr. Pollard is currently subjected to three special conditions of parole. Specifically, Mr. Pollard is required to submit to (i) 24-hour GPS monitoring of his person (the "GPS Monitoring Condition"); (ii) monitoring of his computer use both at home and at his place of employment (the "Computer Monitoring Condition"); and (iii) a curfew that, as implemented by the Probation Office, requires him to be at home from 7 p.m. to 7 a.m. (collectively, the "Special Conditions"). He is also restricted to the Island of Manhattan within the Southern District of New York.

Mr. Pollard has been living under the Special Conditions for over three years now. He has been a model parolee, and has cooperated fully with both the Commission and the Probation Office, which has repeatedly acknowledged Mr. Pollard's exemplary behavior. The Special Conditions effectively bar Mr. Pollard from meaningful employment, impose a serious burden upon his religious practice, and — with respect to the GPS device — cause significant disruptions to his wellbeing due to malfunctions and false alarms.

A. Computer Monitoring

As we have previously advised, the restriction requiring that Mr. Pollard's work computer be monitored has prevented Mr. Pollard from commencing the kind of employment for which he is suited. It is now more than 33 years after Mr. Pollard was arrested and more than three years after his release on parole. Regardless of what might have been the case in the past, we respectfully submit at this point, monitoring Mr. Pollard's computer use at place of employment cannot be viewed as necessary or productive. Accordingly we respectfully request that the Commission remove the computer monitoring condition.

B. Curfew

Mr. Pollard has also been subject to a curfew that confines him to his studio apartment from 7:00 p.m. to 7:00 a.m. most days. Mr. Pollard is not and has never been a nocturnal criminal. He is in a stable marital relationship living with his wife in Manhattan. He is 64 years old. The curfew serves no conceivable purpose but it does prohibit Mr. and Mrs. Pollard from leading a beneficial social life and it prevents Mr. Pollard from leading a full professional life all of which are critical to his rehabilitation and successful reintegration to society. We ask that the curfew be removed or at the very least be modified to a more normative schedule such as a curfew from 12:00 midnight to 6:00 a.m.

C. GPS Monitoring

Since shortly after his release on November 20, 2015 over three years ago Mr. Pollard has been required to wear a heavy, uncomfortable GPS monitor strapped to his wrist 24 hours a day. We need not repeat all the problems that the technical issues have caused over the past three years or how debilitating it is for someone Mr. Pollard's age and physical condition to have to wear this heavy GPS monitor day in day out 24 hours a day. GPS monitoring is unnecessary in this case. The monitoring of Mr. Pollard's location neither protects the public nor deters Mr. Pollard from further criminal conduct. Although a GPS tracking device allows the Probation Office to watch a blip of Mr. Pollard's location move around Manhattan it does nothing to physically prevent or deter him from having a conversation at a coffee shop, within the confines of his apartment or in a public park.

Given the inapplicability of GPS monitoring to this case, the problems with the technology which substantially burden Mr. Pollard's day to day life as well as the interference with his religious practices, the very debilitating nature of the GPS monitor, and taking Mr. Pollard's model behavior the past 3 years into account, we request that the Commission grant Mr. Pollard relief from the GPS monitoring condition.



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March 5, 2019

Page 3

We look forward to hearing from you. We are available at any time to answer any questions that you or any member of the Commission may have.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Eliot Lauer", with a long horizontal flourish extending to the right.

Eliot Lauer

cc: Patricia K. Cushwa
Acting Chairman of the
United States Parole Commission