

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

The United States of America, *et al.*,

CASE NO. 3:23-cv-00566-JGC

Plaintiffs

-v-

**DEFENDANT'S MOTION TO  
VACATE ELECTRONIC  
SURVEILLANCE EQUIPMENT**

LANCE JERMAINE HARRIS,  
Defendant

Now comes *Pro se* defendant, LANCE JERMAINE HARRIS, to request the court to vacate the order for post-incarceration electronic surveillance device in the above matter, for good cause.

- 1) The charges associated with the case were never of a violent nor dangerous nature, such as stalking, drunk driving, armed co-conspirators or the like which might give the court cause for concern of repeat or further offense if the defendant revisits places or individuals involved in the original 'crime';
- 2) The defendant has fully and freely cooperated in every regard with the investigation and adjudication of the charges against him.
- 3) The defendant served his full sentence of incarceration and seeks now only to be allowed to freely return to a productive role in society. The presence of electronic surveillance equipment on his body does prevent same.
- 4) Pre-arranging permission to travel in his job search is unduly burdensome and precludes many potential employers from being sought out as any with

inconsistent weekly work schedules or those with short-notice interview opportunities cannot be considered.

- 5) The defendant poses no flight risk.
- 6) The defendant is fully compliant with all other stipulated aspects of 'parole' including checking in at the assigned halfway house on a weekly basis and agreeably meeting with all other case-related agents each time he is requested to do so.

The complications imposed by the presence of an electronic ankle monitor on the defendant are preventing him from achieving gainful employment and other productive participation in society such as volunteering within his community. This is a level of trespass that constitutes violation of Constitutionally protected (Fourth Amendment) rights to be secure in his property (his body).

In that Mr. Harris has successfully completed his incarceration and is fully compliant with all other punitive measures demanded by the state, he hereby requests Vacating the Order for Electronic Surveillance Device for the good cause stated.

Submitted most respectfully on this \_\_\_\_\_ day of January, the year of our lord, 2026.

/s/ \_\_\_\_\_

i, the man, lance jermaine harris  
on behalf of LANCE JERMAIN HARRIS