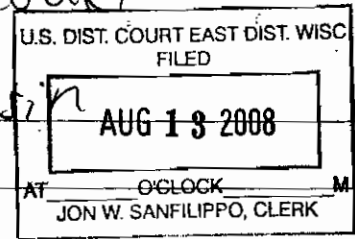


United States District Court

Eastern District of Wisconsin

United States of America,
Plaintiff



Case No. 07-CR-177

✓

Michael McGee, Jr.
Defendant

Defendant's Motion For Release
Prior to Sentencing

Michael McGee, Jr., hereby moves the Court to
release him on bail or to a community facility.

In Support of this motion, Mr. McGee submits
the following:

1) Mr. McGee currently has two pending state criminal
cases to resolve in Milwaukee County of the State
of Wisconsin. Mr. McGee's bail has been reduced
from \$50,000 to \$5,000 - which is currently paid.

2) Mr. McGee has two child support cases that need to be
resolved before they subsequently become criminal felony
charges.

Defendant's motion for release

U.S. v. Michael McGee, Jr. Ca. 07-CR-177

3.) Mr. McGee has childcare needs and would like to be available to assist his wife who starts a technical course on September 8th, 2008, and completes the training in December of 2008. Without Mr. McGee's involvement as primary caretaker of children, his wife will not be able to finish the course she enrolled in. Mr. McGee calls attention to the court's recent precedent of allowing defendants who are convicted to pursue educational goals: U.S. v. Stromei, 2007; U.S. v. Masarik, 2007.

Mr. McGee, therefore motions the court for release prior to sentencing for the aforementioned reasons.

Dated at Waukesha, Wisconsin on August 11, 2008

Respectfully submitted,

Michael McGee

Michael McGee, Jr.