

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN (Green Bay)

UNITED STATES OF AMERICA,

Plaintiff,

Case Number 19-CR-151

v.

STEPHANIE ORTIZ,

Defendant.

MOTION FOR EARLY TERMINATION OF PROBATION

Stephanie Ortiz, by counsel, hereby requests that the Court enter an order allowing early termination of probation. The Court has authority to grant this request pursuant to 18 U.S.C. § 3564(c), which states that the Court may terminate a term of probation and discharge the defendant released at any time after the expiration of one year of probation, pursuant to the provisions of the Federal Rules of Criminal Procedure [FED. R. CRIM. P. 32.1(c)] relating to the modification of probation, if it is satisfied that such action is warranted by the conduct of the defendant released and the interest of justice.

As grounds, counsel for Ortiz states the following:

1. On December 7, 2020, Ortiz entered a guilty plea to one count of conspiracy to distribute and possession with intent to distribute marijuana and tetrahydrocannabinols; acting as an accessory after the fact, contrary to 21 U.S.C. §§ 841(a)(1) and (b)(1)(C) and 846 and 18 U.S.C. § 3. Docket No. 178.
2. Ortiz was sentenced on March 8, 2021. Docket No. 203. The Court imposed four years of probation. Docket Nos. 203, 204.
3. On April 4, 2023, Ortiz appeared in court for a probation review hearing. The Court modified conditions of probation to include a search provision. The minutes also note if Ortiz does well on supervision, to petition the Court for early termination. Docket No. 418.

4. Ortiz is scheduled to terminate from probation on March 8, 2025.
5. United States Probation Officer (USPO) Norman is assigned as Ortiz's supervising officer. USPO Kosmoski formerly supervised Ortiz. Ortiz believes she is in compliance with the terms of her probation.
6. Counsel confirmed with the Clerk of Court that Ortiz paid the special assessment.
7. Ortiz has been on supervision since March 8, 2021 (or approximately 33 months to date), and therefore she meets the timing requirement for consideration of early termination in that he has been on supervision for more than one year. 18 U.S.C. § 3564(c).
8. Ortiz completed her AODA treatment requirements and has no other pending treatment needs. Specifically, Ortiz completed a recent AODA assessment through the Oneida Behavioral Services, which was provided to the USPO. The clinician indicated: Stephanie came in for an AODA assessment on 12/11/23. After completing the assessment, and providing a urine drug screen, there are no treatment recommendations for her, and her drug screen she provided was negative for all substances.
9. Ortiz has completed the following objectives since she was initially charged in the conspiracy:
 - a. Since 2019 she maintained employment at End Domestic Abuse WI: the WI Coalition Against Domestic Violence and have been promoted two times. In January of 2019 her promotion included going from the Prevention & Public Awareness Coordinator to the Director of Prevention & Outreach with the increase of supervisory responsibilities of five staff. Then again in January 2022 she was promoted to Co-Director of Prevention & Engagement. In this role, she supervises 12 staff and manages a \$1 million dollar Statewide Domestic Violence Prevention Initiative budget that includes a grant program, a statewide campaign and annual youth conference. Additionally, she provide training and technical assistance to all of the Domestic & Sexual Violence service providers throughout the state of WI with a focus on prevention and engaging youth. Over the past 5 years, she has presented and spoke at countless community events and trainings - most notably she was the keynote speaker at the 2019 UW-Oshkosh Women's Leadership Conference, plenary speaker at the Wisconsin Coalition Against Sexual Assault 2020 Training Institute and the 2020 recipient of the Community Leader - Bridging the Generation Gap award from Peace Network Inc.
 - b. In 2022, in addition to her full-time job, she launched her own business called Weaving Ways which is a consulting business that specializes in facilitation services, strategic planning and organizational development. Her approach and tagline for my consulting work is: we are all active participants in the world we create, therefore we are part of the problem as well as the solution. Since the launch of her business, she has worked with: Great Lakes Intertribal Epidemiology Center, the Coalition to Stop Violence Against Native Women in New Mexico, the National Indigenous Women's Resource Center, the Viejas

Band of Kumeyaay Indians Wellness Center in California and the Lac Vieux Desert Health Center in Michigan.

- c. Beginning in February of 2024, Ortiz will be working full-time at We All Rise: African American Resource Center as the new Youth Prevention and Evaluation Director. This role includes a salary increase and full coverage health insurance which is an enormous benefit and advancement for me professionally and personally.
 - d. In terms of sobriety, her last use of marijuana was through the period of December of 2022 shortly after her mom was sentenced to prison to January of 2023. She tested positive in February 2023 during a visit with her parole officer. Since then she has been clean and consistent with finding other ways to cope with stress and hardships. She walks, reads, spends time with her two kids, and keeps herself goal-oriented, which have been ways she has remained sober.
 - e. Overall, over the past 5 years she has not committed any further crimes, she feels she has completed the objectives of her probation and shown she can maintain healthy progress in all aspects of her life. With early termination of her probation, she will regain her right to vote, right to travel, and right to visit her mother in prison, which will contribute greatly to her personal and professional development including community involvement. She looks forward to continued contributions to my family and community in ways that she hopes restores, and to some extent reconciles, the harm she has caused in the past.
- 10. Ortiz has complied with the vast majority of the conditions of her current term of probation and thus early termination is warranted by her conduct. Ortiz satisfied her treatment obligations. The interests of justice would not be hampered or devalued by early termination of probation.
 - 11. Counsel for Ortiz has conferred with counsel for the government in this matter. Counsel for Ortiz is authorized to state that the government takes no position on this request.
 - 12. Counsel for Ortiz is authorized to state that the United States Probation Office takes no position on this request for early termination of supervision.
 - 13. The hearing required under Rule 32.1 is not necessary because the relief sought is favorable to the defendant, does not extend the term of probation, and the government does not object to the relief sought. See FED. R. CRIM. P. 32.1(c)(2).

THEREFORE, on the above grounds, counsel for Ortiz respectfully requests that the Court issue an order terminating Ortiz's probation as of the date of the order.

Dated at Green Bay, Wisconsin on Friday, January 19, 2024.

Respectfully submitted,

/s/ **Lee D. Schuchart**

Lee D. Schuchart

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