

IN THE
UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
)	
v.)	No. 08 CR 192
)	Judge Ruben Castillo
)	
HANJUAN JIN)	

MOTION FOR EARLY TERMINATION

Defendant HANJUAN JIN, by the Federal Defender Program and its attorney JOHN F. MURPHY, moves this Court pursuant to 18 U.S.C. §3583(e)(1) for entry of an order terminating supervised release early. In support of said motion, the defendant states as follows:

1. On August 29, 2012, Ms. Jin was sentenced by Honorable Linda Reade of the U.S. District Court for the Northern District of Iowa to 48 months custody of the Bureau of Prisons following her conviction for theft of trade secrets in violation of 18 U.S.C. §1832(A)(3). Additionally, the court imposed a three-year term of supervised release, a mandatory special assessment of \$300.00, and a fine of \$20,000. (R. 236)
2. Ms. Jin completed her custodial sentence, and began his supervised release term on February 9, 2017.
3. During the course of her supervised release, Ms. Jin has assiduously complied with all the conditions of supervised release. She has paid both her special assessment and fine. Therefore, she has no outstanding financial obligations. She has

not committed any other offenses. She has met all the reporting requirements imposed upon her. She is presently under low-risk reporting status with the probation office. Further, Ms. Jin has sought employment training with CARA Chicago to prepare herself for the workforce. (See Attached letter from CARA Chicago). In other words, Ms. Jin has been an exemplary supervisee.

4. In light of his success on supervision, early termination is an appropriate action at this time.

5. The U.S. Probation Office, by U.S.P.O. Jennifer Novak, agrees with this motion.

6. A proposed order is attached hereto.

WHEREFORE, for the foregoing reasons, the defendant HANJUAN JIN respectfully requests that this Court enter an order terminating supervised release early.

Respectfully submitted,

FEDERAL DEFENDER PROGRAM
Carol A. Brook,
Executive Director

By: /s/John F. Murphy
John F. Murphy
Attorney for Defendant

FEDERAL DEFENDER PROGRAM
55 E. Monroe Street, Suite 2800
Chicago, Illinois 60603
(312)621-8352

CERTIFICATE OF SERVICE

The undersigned, John F. Murphy, an attorney with the Federal Defender Program hereby certifies that the following document:

MOTION FOR EARLY TERMINATION

was served on February 26, 2018, in accordance with Fed. R. Crim. P. 49, FED. R. CIV. P. 5, LR 5.5, and the General Order on Electronic Case Filing (ECF) pursuant to the district court's system as to ECF filers.

By: /s/ John F. Murphy
John F. Murphy
Attorney for the Defendant
FEDERAL DEFENDER PROGRAM
55 E. Monroe Street, Suite 2800
Chicago, IL 60603
(312) 621-8352

Attachment

Letter from CARA Chicago



Jesse Teverbaugh
Director of Student & Alumni Affairs
Cara Chicago
237 South Desplaines,
Chicago, IL 60661
February 14, 2018

To Whom It May Concern

Hanjuan Jin joined Cara Chicago in Nov. 2016 as a trainee referred by the re-entry program of the Salvation Army. Cara Chicago is a 25 year-old NPO organization that assists individuals who are chronically unemployed, homeless or at-risk to achieve real and lasting success through comprehensive training in job and life skills, permanent job placement and critical support services. Once accepted, all participants must go through a rigorous 4-week transformation boot camp.

It is a very demanding Personal and Professional development program. Ms. Jin not only completed our training but she thrived in it and has become a leader in this community and was an outstanding student. She demonstrated not only her professionalism but also her warm and caring attitude towards fellow-students and staffs. Her determination to prepare for reintegration into the world of work has never wavered.

She has battled against formidable obstacles in preparing for employment; not only her background, but the recurrence of cancer that requires frequent hospital visits. Nothing, however, has retarded her singular determination to absorb skills that will make her a desirable job candidate.

She has completed the Diesel Mechanical Training course with a view to perhaps finding a position in the Automobile industry. She has joined the Food Service Training program with a view to exploring job opportunities in the food industry. At Cara, Ms. Jin was awarded the internship as Receptionist, enabling her to gain experience in a not-for-profit company. Through Cara Connect, an employment agency run by Cara, she recently completed two IT assignments with glowing appraisals from Cara's clients.

It gives me great pleasure, along with being honored to say that because of her integrity, reliability and professionalism that Ms Jin has not just enhanced her skills that are needed to gain employment, but she understands that it is not all about getting a job, it is about Transformation and a life change. She has embraced this new way of life not only in her professional life but in her personal life as well. The only thing that is missing is for more people to believe in her and give her the chance that she has earned.

If you have any questions regarding Ms. Jin's character or any other area please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads 'Jesse Teverbaugh'. The signature is written in a cursive, flowing style.

Jesse Teverbaugh (312-798-3333)