

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA)	
)	
)	No. 08 CR 888
v.)	
)	Judge James B. Zagel
WILLIAM CELLINI)	
)	

**DEFENDANT’S UNOPPOSED MOTION FOR EARLY TERMINATION OF
SUPERVISED RELEASE**

Defendant William Cellini respectfully moves this Court to terminate his term of supervised release and discharge him pursuant to 18 U.S.C. § 3583(e)(1) and Rule 32.1(c) of the Federal Rules of Criminal Procedure, and in support of his motion, states as follows:

1. On November 9, 2012, the Court entered an amended judgment sentencing Mr. Cellini to serve one year and one day of imprisonment, pay a fine of \$75,200, and serve a term of twenty-four months of supervised release. *See* Dkt. No. 1154.
2. On November 5, 2012, the Government filed a Satisfaction of Judgment reflecting that Mr. Cellini had paid the ordered fine. *See* Dkt. No. 1128.
3. On December 5, 2013, Mr. Cellini successfully completed his term of imprisonment, was released from incarceration, and began serving his term of supervised release.
4. Pursuant to 18 U.S.C. § 3583(e)(1), after considering the factors in Section 3553(a), the Court may “terminate a term of supervised release and discharge the defendant released at any time after the expiration of one year of supervised release, pursuant to the provisions of the Federal Rules of Criminal Procedure 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”

5. As of December 5, 2014, Mr. Cellini completed one year of supervised release.

6. Mr. Cellini has otherwise fully satisfied the terms of his sentence and paid all outstanding financial penalties in full.

7. Mr. Cellini respectfully submits that early termination of the supervised release portion of his sentence is warranted by his conduct to date and would be in the interests of justice.

8. Undersigned counsel has discussed this motion with Assistant U.S. Attorney Julie Porter and U.S. Probation Officer Lynea Turner. Neither oppose Mr. Cellini's requested relief.

9. Pursuant to Federal Rule of Criminal Procedure Rule 32.1, no hearing is required to terminate Mr. Cellini's term of supervised release, because the requested termination would not extend the term of supervised release, and the government has received notice of the relief sought, has had a reasonable opportunity to object, and has not done so. *See Fed. R. Crim. P. 32.1(c).*

WHEREFORE, Defendant William Cellini requests that the Court enter an order terminating his term of supervised release.

Dated: December 5, 2014

Respectfully Submitted,

/s/ Thomas L. Kirsch
Dan K. Webb (dwebb@winton.com)
Thomas L. Kirsch (tkirsch@winston.com)
Winston & Strawn LLP
35 West Wacker Drive
Chicago, Illinois 60601
T: (312) 558-5600
F: (312) 558-5700

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on December 5, 2014, the foregoing was served on all counsel of record via the Electronic Case Filing system.

/s/ Thomas L. Kirsch
Thomas L. Kirsch