

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

UNITED STATES OF AMERICA

Plaintiff,

vs.

WILLIAM RODRIGUEZ ABADIA,

Defendant.

_____ /

MOTION TO TERMINATE SUPERVISED RELEASE

Defendant, WILLIAM RODRIGUEZ ABADIA, by and through his undersigned counsel, hereby files this Motion for Early Termination of the five years supervised release imposed by this Court on March 29, 2006, and in support thereof, states:

1. Mr. Rodriguez Abadia plead guilty to Count One of the Indictment, Conspiracy to import five kilograms or more of cocaine into the United States in violation of Title 21 U.S.C. § 963.
2. On January 16, 2006, Mr. Rodriguez Abadia self surrendered in Panama to United States Authorities.
3. On March 29, 2006, this Court sentenced Mr. Rodriguez Abadia to 262 months then reduced his sentence to 60 months followed by five (5) years of supervised release on February 15, 2007.
4. Mr. Rodriguez Abadia has continued to make himself available to the Government and has assisted with matters of great importance to the Government.

5. His wife, _____ has been an active member of her community. In 2006 to 2008, she began working for _____ as a Customer Service Representative and in 2007 until present, she began working for _____, as a Sales Manager. _____ is now a Permanent U.S. Resident.

6. Mr. Rodriguez Abadia, since his release has worked for _____ as a Sales Representative, with _____ . and is currently employed with _____, _____ as a Sales Representative.

7. Mr. Rodriguez Abadia's daughters _____ have excelled academically. _____ (17 years old) just graduated from high school with a silver cord and as a member of the French Honor Society with a GPA of 3.6. Vice President Joe Biden attended her graduation ceremony due to the recognition they received for their AP Exam grades. _____ took 3 AP credits and was successful in all of them. As a result of _____ achievement and community service, she received a grant from _____ where she is currently enrolled with a major in Pre-Law. _____ is also a member of the Cheerleading Team which has competed and won two national competitions. _____ (15 years old) is currently a sophomore in high school, an honor student with a GPA of 4.8. Since elementary school she has been an active participant in programs against bullying and gangs. In 2009, _____ was selected to participate in the _____ Talent Identification Program. _____ was given the opportunity to take the SAT when she was a freshman in high school because she scored better than most seniors did on her FCAT test. Both of his daughters are Permanent U.S. Residents.

8. Assistant United States Richard Gregory supports the granting of this motion.

9. The Lead Case Agent, Edward Kazerosky, who is now retired, supports the granting of this motion.

10. Undersigned counsel has not been able to reach, U.S. Probation, Andrea Boone, to obtain her position in the granting of this motion.

WHEREFORE, the Defendant, WILLIAM RODRIGUEZ ABADIA, prays that this Court grant this Motion for Early Termination of Supervised Release based on the factors which include a stable home environment, strong family support, consistent employment and continued assistance to the Government.

CERTIFICATE OF SERVICE

I hereby certify that on March 18, 2013, undersigned counsel electronically filed the foregoing document with the Clerk of Court using CM/ECF.

Respectfully submitted,

Attorney for Defendant

E-Mail:

By: /s/