

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF MINNESOTA**  
*Criminal No. 21-cr-108 (PAM/TNL) (3)*

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	<b>MOTION FOR EARLY DISCHARGE</b>
vs.	)	<b>FROM SUPERVISED RELEASE</b>
	)	<b>PURSUANT TO 18 U.S.C. §§ 3564(a)(c) and</b>
J. ALEXANDER KUENG,	)	<b>3583(e)(1)</b>
	)	
Defendant.	)	
	)	
	)	

Thomas C. Plunkett, Esq., on behalf of J. Alexander Kueng, moves this Court for an order directing that Mr. Kueng be discharged from probation supervision and further proceedings in this matter terminated forthwith. This motion is based on 18 U.S.C. §§ 3564(a)(c) and 3583(e)(1).

On May 6, 2021 Mr. Kueng was charged by indictment with 2 Counts of Deprivation of Rights Under Color of Law. (*See* Docket at 1) On February 24, 2024 a jury convicted Mr. Kueng on both Counts. (*See* Docket at 282) On July 7, 2022 Mr. Kueng was sentenced before this Court to 36 months in prison for Counts 2 and 3 to be served concurrently. This Court also ordered that Mr. Kueng serve a term of 2 years supervision on Count 2, and 2 years on Count 3, concurrently. (*See* Docket at 497) Mr. Kueng finished his federal court sentence and remained in the custody of the Bureau of Prisons pursuant to a sentence imposed for the same course of conduct in Hennepin County District Court file number 27-CR-21-12953. Mr. Kueng left the custody of the Bureau of Prisons following expiration of his state court sentence as of January 15, 2025. Since his release he has been compliant with probation in all manners. Continued

supervision serves no purpose to Mr. Kueng or the community and is a waste of a precious correctional asset. Mr. Kueng's supervising probation officer opposes this motion.

Mr. Kueng now respectfully asks this Court to terminate his probation effectively immediately.

Respectfully submitted,

Dated: July 30, 2025

/s/ - Thomas C. Plunkett

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