

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

)	
UNITED STATES OF AMERICA,)	
)	Case No. 1:21-cr-00028-APM
v.)	
)	
CONNIE MEGGS,)	
)	
Defendant.)	
)	

MOTION TO MODIFY CONDITIONS OF RELEASE

Defendant Connie Meggs, by and through the undersigned counsel, hereby respectfully moves this Court for an Order permitting her to remove location monitoring for the purpose of allowing Mrs. Meggs to travel to Washington, DC for her sentencing next week. On March 26, 2021, the Court entered an Order Setting Conditions of Release (ECF No. 114) in which it required that Ms. Meggs be placed on GPS monitoring. So that Mrs. Meggs can travel to her sentencing and related pre-sentencing hearing on August 29 and 30, 2023, respectively, Mrs. Meggs requests the Court temporarily lift the requirement that she be placed on GPS monitoring from August 25, 2023, through September 1, 2023 (she is driving to the District the morning of August 28, 2023, and planning to depart the evening of August 30).

Defense counsel has consulted with Mrs. Meggs pretrial services officer who advises that pretrial services does not oppose, but defers to the Court on this request.

[SIGNATURE ON NEXT PAGE]

Dated: August 24, 2023

Respectfully submitted,

/s/ Stanley E. Woodward, Jr.

Stanley E. Woodward, Jr. (D.C. Bar No. 997320)

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CERTIFICATE OF SERVICE

On August 24, 2023, the undersigned hereby certifies that a true and correct copy of the foregoing was electronically filed and served via the CM/ECF system, which will automatically send electronic notification of such filing to all registered parties.

/s/ Stanley E. Woodward, Jr.

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