

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

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**UNITED STATES OF AMERICA,**

**v.**

**CONNIE MEGGS,**

**Defendant.**

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) **Criminal No. 1:21-cr-00028-APM**  
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**UNOPPOSED MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE**

1. Defendant Connie Meggs, by and through the undersigned counsel, respectfully requests that this Honorable Court modify its Order to authorize Connie Meggs on November 4, 2021 through November 5, 2021 to travel to Boynton Beach Florida to visit with her senior parents.
2. The government does not object to this request.
3. The Pretrial Services Officer Megan Martin does not object to this request.
4. Connie Meggs is planning to travel by automobile with one grandchild, about three-three and half hours, to her parents' home in Boynton Beach, Florida where she would spend one night.
5. Connie Meggs' father turns ninety-four (94) on November 6, 2021, and she is planning to visit and bring some medical supplies for her mom to help her dad.
6. Counsel has provided the residential address of Connie Meggs' parents to government counsel and to Pretrial Services.
7. As part of the modification, Connie Meggs would be removed from the radio frequency location monitoring but will be required to make daily calls to his Pretrial Services Officer and contact the Pretrial Services Officer when returns home on November 5, 2021.
8. All other conditions shall remain the same.

WHEREFORE, Connie Meggs respectfully moves that this Honorable Court modify its Order Setting Conditions of Release to authorize Mrs. Meggs to travel out of town from November 4, 2021 through November 5, 2021 to stay one night with her parents in Florida.

Dated: October 29, 2029

Respectfully submitted,

/s/ Stanley E. Woodward, Jr.

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*Counsel for Defendant Connie Meggs*

**CERTIFICATE OF SERVICE**

On October 29, 2021 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.

Respectfully submitted,

/s/ Juli Z. Haller  
Juli Z. Haller, (D.C. Bar No.466921)