

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

CONNIE MEGGS,

Defendant.

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Criminal No. 1:21-cr-00028-APM

**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 to travel to Boynton Beach Florida to visit with her senior parents over Christmastime, from December 26, 2021 through December 29, 2021.
2. The government does not oppose this request.
3. The Pretrial Services approves this request.
4. Connie Meggs is planning to travel by automobile, about three-three and half hours, to her parents' home in Boynton Beach, Florida where she would spend three nights.
5. Connie Meggs' parents are senior, her father is ninety-four (94) years old. Connie would visit as well as assist her mom.
6. Counsel has provided the residential address of Connie Meggs' parents to government counsel and to Pretrial Services.
7. Between December 26, 2021 through December 29, 2021, Mrs. Connie Meggs shall not be required to report by telephone to Pretrial Services once a day, but shall maintain her monitoring device. Upon her return to her residence, Mrs. Meggs shall notify her Pretrial Services Officer.

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 December 26, 2021 through December 29, 2021 to stay three nights with her parents in Florida over the Christmas holiday.

Dated: December 16, 2021

Respectfully submitted,

/s/ Juli Z. Haller

Juli Z. Haller, (D.C. Bar No.466921)
The Law Offices of Julia Haller
601 Pennsylvania Avenue, N.W., Suite 900
Washington, DC 20004
Telephone: (202) 729-2201
HallerJulia@outlook.com

Counsel for Defendant Connie Meggs

CERTIFICATE OF SERVICE

On December 16, 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