

Dyke Huish (SBN: 167690)
Huishlaw@mac.com
LAW OFFICE OF DYKE E. HUIISH
26161 Marguerite Pkwy., St. B
Mission Viejo, CA 92692
Telephone: (949) 837-8600

Attorney for Defendant, RUSSELL TAYLOR

**UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA**

THE UNITED STATES OF
AMERICA,

Plaintiff,

vs.

RUSSELL TAYLOR,

Defendants.

Case No. 1:21-CR-00392

**REQUEST TO MODIFY TERMS AND
CONDITONS OF BAIL**

JUDGE: ROYCE C. LAMBERTH

MOTION TO MODIFY BOND CONDITIONS

The defendant, RUSSELL TAYLOR, by and through his undersigned counsel does hereby request the Court make the following modifications of bond in the above styled cause:

1. The removal of the Location Monitoring/Ankle Monitor as previously ordered by this Court on August 12, 2021.
2. All other "Conditions of Release" to remain.

On or about June 10, 2021 Mr. Taylor voluntarily surrender himself to the F.B.I. upon notification of the filing of an Indictment. Subsequently, the Magistrate Court released Mr. Taylor on an ankle monitor. On August 11, 2021 this Court upheld the Magistrates order and continue the term and condition of Location Monitoring on Mr. Taylor in the form of an Ankle Monitoring System. Since June of 2021 Mr. Taylor has been on a constant Location Monitoring by Pre Trial Services. He has had no violations and has been in compliance with all terms and conditions of his release terms. Mr. Taylor has not exhibited any concerns or activities, that were relevant to this case, between January 6, 2021 and the date of this request.

On May 27, 2021 Mr. Taylor was advised by his Doctor (David Petersen DPM) that the Ankle Monitor had caused him to suffer from excessive leg swelling and painful liaisons which have gradually increased. These liaisons and swelling have grown in size and concern over the last few months and Doctor Petersen has recommended that the monitor be removed in order to allow his medical issues to heal. The report of Dr. Petersen is attached as Exhibit 1.

Counsel for Mr. Taylor contacted the Government (June 9, 2022) and Pre-Trial Services (June 17, 2022) and was informed that both parties would defer to the Court.

Given Mr. Taylor compliance and good behavior both before the monitor and since the monitor was placed upon him and his ongoing medical issues, we request that the Court grant his request for the removal of said monitor with all other conditions to remain in effect.

The parties are available for oral argument should the Court need additional information concerning this joint request.

Dated: June 17, 2022

LAW OFFICE OF DYKE E. HUISH

Dyke E. Huish

Attorney for Russell Taylor