IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES *

vs. * Case No.: 21-CR-28-APM

THOMAS E. CALDWELL *

* * * * * * * * * * *

UNOPPOSED REQUEST TO MODIFY CONDITIONS OF RELEASE

COMES NOW, the Defendant, Thomas E. Caldwell, by and through his attorney, David W. Fischer, Esq., and respectfully requests that the Court modify the conditions of release in this matter, specifically to allow the Defendant to attend a Celebration of Life ceremony, and in support of said motion states as follows:

- On March 12, 2021, the Defendant was released on 24/7 lock-down home incarceration
 at his residence and GPS monitoring. To date, the Defendant has fully complied with all
 conditions of release.
- 2. The Defendant requests permission to leave his home to attend a Celebration of Life ceremony (funeral) for his best friend on May 22, 2021 from 1:00 p.m. to 5:00 p.m. (plus travel time) in Loudon County, Virginia.
- 3. Assistant U.S. Attorney Kathryn Rackozy does not oppose the instant request.
- 4. Pretrial Services Officer Sara Morehead, who has been provided with full details of the above-referenced event, does not oppose the instant request.

WHEREFORE, the Defendant respectfully requests that he be permitted to attend the Celebration of Life ceremony for his best friend on May 22, 2021 from 1:00 p.m. to 5:00 p.m. in Loudon County, Virginia.

/s/

David W. Fischer, Esq.
Federal Bar No. 023787
Law Offices of Fischer & Putzi, P.A.
Empire Towers, Suite 300
7310 Ritchie Highway
Glen Burnie, MD 21061
(410) 787-0826
Attorney for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 6th day of May, 2021, a copy of the foregoing Unopposed Motion to Modify Conditions of Release was electronically filed with the Clerk of the United States District Court using CM/ECF, with a notice of said filing to the following:

Counsel for the Government:

Office of the United States Attorney
555 4th Street, NW
Washington, DC 20001

/s/
David W. Fischer, Esq.

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES													
VS.							* Case No.: 21-CR-28-APM						
THOMAS E. CALDWELL													
	*	*	*	*	*	*	*	*	*	*	*		
						ORD	<u>ER</u>						
Upon consideration of the Defendant's Unopposed Request to Modify Conditions of													
Release, it is hereby ordered by the United States District Court for the District of Columbia that													
the Motion be granted and that the Defendant be permitted to attend a Celebration of Life													
ceremony on May 22, 2021 from 1:00 p.m. to 5:00 p.m. (plus travel time) in Loudon County,													
Virginia.													
Date							Honorable Amit P. Mehta						
						Unite	nited States District Court						