

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

UNITED STATES OF AMERICA,

v.

PAUL C. RAE,

Defendant.

Criminal No. 21-cr-378

**POST-TRAVEL STATUS REPORT AND
RENEWED MOTION FOR REMOVAL OF
ANKLE MONITOR AND ALLOW ALL-
FLORIDA TRAVEL**

POST-TRAVEL STATUS REPORT AND RENEWED REQUEST FOR REMOVAL OF
ANKLE MONITOR AND ALLOW ALL-FLORIDA TRAVEL

NOW comes Defendant, Paul C. Rae, by and through his counsel of record, John M. Pierce, Esq., respectfully requesting this Honorable Court to modify his current conditions of release.

Defendant has returned from his wedding travel without incident. Although the ankle monitor caused several problems during the travel, Mr. Rae reports compliance with all conditions. Defendant renews his request for removal of the ankle monitor for reasons already described in prior pleadings.

Mr. Rae also renews his request for the ability to travel and work throughout the state of Florida. Mr. Rae's parents live in northern Florida along with numerous work associates and friends.

Wherefore, Mr. Rae respectfully requests this honorable Court to grant his motion to modify the conditions of his pretrial release by eliminating the need for GPS ankle monitoring as well as eliminating the travel and work restrictions within the state of Florida.

Date: November 8, 2022

Respectfully Submitted,



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CERTIFICATE OF SERVICE

I, John M. Pierce, hereby certify that on this day, November 8, 2022, I caused a copy of the foregoing document to be served on all counsel through the Court's CM/ECF case filing system.

/s/ John M. Pierce
John M. Pierce