

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA
Plaintiff,

vs.

CASE NO.: 21-CR-28 (APM)

CONNIE MEGGS,
Defendant.

**DEFENDANT’S UNOPPOSED MOTION FOR MODIFICATION
OF PRETRIAL RELEASE CONDITIONS**

COMES NOW the defendant, CONNIE MEGGS, by and through her undersigned counsel and files this Unopposed Motion for Modification of Pretrial Release Conditions and in support states:

1. On March 26th, 2021 Mrs. Meggs was granted pretrial release under strict conditions, among which is that she is under a “24-hour-a-day lock-down at [her] residence except for medical necessities and court appearances or other activities specifically approved by the court.” This includes GPS monitoring of Mrs. Meggs. Doc. 114

2. Mrs. Meggs is a devoutly religious person and wishes to attend Sunday services at her established house of worship. These services take place at a recognized church near her residence and to and from which she is driven by a family member.

3. The times of the services she is asking approval to attend, and the physical address of the church have been furnished to the U.S. Pretrial Services Officer supervising Mrs. Meggs. To travel directly to the church, attend Sunday services and afterwards return directly to her residence will take from 11:00 a.m. to 1:00 p.m.

4. Mrs. Meggs hereby asks the Court for authorization to attend these services.

5. The undersigned has conferred with Assistant United States Attorney Jeffrey S. Nestler, Esq., who has authorized the representation that the government does not oppose the relief requested herein.

6. The undersigned has likewise conferred with United States Pre-Trial Services Officer Megan Martin who likewise has authorized the representation that her office does not oppose Mrs. Meggs' request.

WHEREFORE, the defendant, CONNIE MEGGS, respectfully requests this Court modify the terms and conditions of her home confinement to permit her to leave her residence on Sundays between the hours of 11:00 a.m. until 1:00 p.m. for the sole purpose of attending religious services.

RESPECTFULLY SUBMITTED,

/s/ David Anthony Wilson
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 30th, 2021, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to the following: Office of the United States Attorney.

/s/ David Anthony Wilson
DAVID ANTHONY WILSON