

UNITED STATES DISTRICT COURT

DISTRICT OF COLUMBIA

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UNITED STATES OF AMERICA,	:	Criminal No. 21-cr-40 (TNM)
	:	
v.	:	
	:	
PATRICK MCCAUGHEY III,	:	
	:	
Defendant.	:	September 17, 2021
----- X		

MOTION TO MODIFY CONDITIONS OF RELEASE

The Defendant Patrick McCaughey III respectfully moves that his conditions of release be modified such that the Court “remove his curfew enforced by location monitoring condition.”

This motion is made at the suggestion and behest of the defendant’s supervising Pretrial Services Officer, Senior USPO Michael Jones, who indicated to counsel both verbally and in the attached correspondence that it was his belief that, after his approximately four (4) months of supervising Mr. McCaughey, that location monitoring is “excessive” at this time. (Exhibit A) Officer Jones informed undersigned counsel that this defendant is a “model” client and that a less intensive level of supervision was warranted at this time.

Counsel respectfully submits that, as a senior Pretrial Services Officer who has monitored this defendant for months and countless other defendants over many years, Officer Jones is eminently qualified to make such an assessment and the defendant therefore respectfully requests that Court accept his recommendation.

The government opposes this request.

Dated: Stamford, Connecticut
September 17, 2021

By: *Lindy R. Urso*
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed and served electronically on all parties of record, on this 17th day of September in the year of our Lord 2021.

Lindy R. Urso
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