

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

DANIEL GOODWYN,

Defendant.

Case No. 1:21-cr-00153-RBW-1

DEFENDANT DANIEL GOODWYN'S MOTION TO MODIFY BOND CONDITIONS

Mr. Goodwyn, through his attorney, Joseph D. McBride, Esq. respectfully requests that this Honorable Court modify the March 12, 2021, ORDER SETTING CONDITIONS OF RELEASE in his case. (*See* ECF No. 12) Specifically, Mr. Goodwyn asks this Court to remove the condition of home detention.

Mr. Goodwyn is thankful that his March 2, 2022, Motion to Modify Bond Conditions (*See* Pacer Doc. 41) was granted by this Court and that location monitoring services have been terminated. (*See* ECF No. 41) Mr. Goodwyn, now, respectfully moves for the termination of home detention.

On Tuesday, March 15, 2022, undersigned counsel spoke to Pretrial Services Officer Donald Rogan and AUSA Susan Lehr regarding the above-mentioned request. AUSA Lehr replied that she has "No objection to removing the home detention requirement." Similarly, Pretrial Services Officer Donald Rogan replied that he too has "...no objection to the removal of the home detention condition."

Therefore, for the reasons stated above, and those enumerated in Mr. Goodwyn's March 2, 2022, Motion to Modify Bond Conditions (*See* ECF No. 41) Mr. Goodwyn, through his attorney, Joseph D. McBride, Esq., respectfully requests that this Honorable Court modify his conditions of release by terminating its home detention requirement.

DATED: MARCH 15, 2022

Respectfully Submitted,

/s/ Joseph D. McBride, Esq.

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