

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.	:	May 5, 2021
----- X		

CONSENT MOTION TO REPLACE REAL ESTATE SURETY

The Defendant Patrick McCaughey III respectfully moves the real property to be liened as a condition of his release be changed from the defendant’s father’s South Salem, NY property (approximately \$450,000 in equity) to the defendant’s grandmother’s property known as 52 Hillside Avenue, New Canaan, CT 06840 (equity of approximately \$725,000). The reason for this request is that undersigned counsel just learned that Westchester County, NY imposes a 1/3% “Mortgage Tax” on *any* recording that involves a real estate lien, which would cost the defendant approximately \$6,000.00, whereas in Connecticut, the recording fees are less than \$100.

The government CONSENTs to this request.

Dated: Stamford, Connecticut
May 4, 2021

By: /s/
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