

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

UNITED STATES

\*

vs.

\*

Case No.: 21-CR-28-APM

THOMAS E. CALDWELL

\*

\* \* \* \* \*

**UNOPPOSED REQUEST TO MODIFY CONDITIONS OF RELEASE**

COMES NOW, the Defendant, Thomas E. Caldwell, by and through his attorney, David W. Fischer, Esq., and respectfully requests that the Court modify the conditions of release in this matter as follows:

1. On March 12, 2021, the Defendant was released on 24/7 lock-down home incarceration at his residence and GPS monitoring. To date, the Defendant has fully complied with all conditions of release.
2. The Defendant requests permission to leave his home on December 25, 2021 from 11:30 a.m. to 7:00 p.m. to celebrate the Christmas holiday with neighbors who reside less than a mile from the Defendant's home. Further, the Defendant will be accompanied by his wife, Sharon Caldwell.
3. Assistant U.S. Attorney Kathryn Rakoczy does not oppose the instant request.

WHEREFORE, the Defendant respectfully requests that he be permitted to leave his home on December 25, 2021 from 11:30 a.m. to 7:00 p.m. to celebrate the Christmas holiday at his neighbor's house while accompanied by his wife, Sharon Caldwell.

/s/  
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David W. Fischer, Esq.  
Federal Bar No. 023787  
Law Offices of Fischer & Putzi, P.A.  
Empire Towers, Suite 300  
7310 Ritchie Highway  
Glen Burnie, MD 21061  
(410) 787-0826  
Attorney for Defendant

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 20<sup>th</sup> day of December, 2021, a copy of the foregoing Unopposed Motion to Modify Conditions of Release was electronically filed with the Clerk of the United States District Court using CM/ECF, with a notice of said filing to the following:

Counsel for the Government:

Office of the United States Attorney  
555 4<sup>th</sup> Street, NW  
Washington, DC 20001

/s/  
\_\_\_\_\_  
David W. Fischer, Esq.