

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

Complainant,

v.

KELLY MEGGS

(Styled as *USA v. Thomas Edward Caldwell*
incorporating cases against multiple Defendants)

Defendant

Criminal Case No.

1:21-cr-28-8-APM

Assigned to the Honorable
Amit Mehta, District
Court Judge

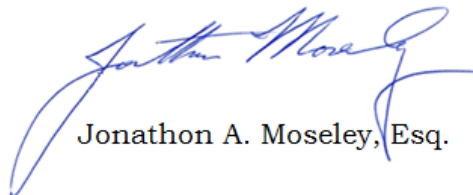
**DEFENDANT KELLY MEGGS' MOTION FOR MODIFICATION OF CONDITIONS
OF DETENTION AND ABILITY TO REVIEW DISCOVERY MATERIAL**

COMES NOW Defendant Kelly Meggs, by counsel, and hereby moves the Court to
modify the terms of detention under which he has been ordered to be held in detention *pre-trial*.

In support of his motion, Kelly Meggs files his supporting Memorandum of Law.

Dated: December 21, 2021

RESPECTFULLY SUBMITTED
KELLY MEGGS, *By Counsel*



Jonathon A. Moseley, Esq.

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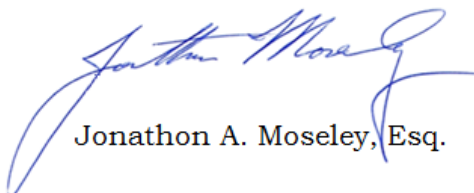
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CERTIFICATE OF CONSULTATION

I hereby certify that at on December 20, 2021, I emailed to all members of the prosecution team at 4:10 PM, asking if the Government has a position consenting to, opposing, or requesting compromise or adjustments to the motion. As of 12:45 PM I have not heard a response back from any member of the US Attorneys' team.



Jonathon A. Moseley, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on December 21, 2021, I electronically filed the foregoing document with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to the following CM/ECF participants. From my review of the PACER / ECF docket records for this case that the following attorneys will receive notice through the ECF system of the U.S. District Court for the District of Columbia.

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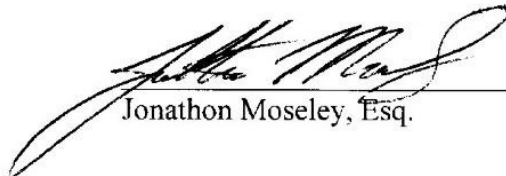
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