

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

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UNITED STATES OF AMERICA,)	
)	Criminal No. 1:21-cr-00028-APM
v.)	
)	
CONNIE MEGGS,)	
)	
Defendant.)	
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**DEFENDANT CONNIE MEGGS' UNOPPOSED MOTION TO MODIFY
CONDITIONS OF PRETRIAL RELEASE**

1. This court previously granted Defendant Connie Meggs' Motion to Modify, ECF 628, which allowed her to repeatedly weekly travel to Boynton Beach Florida. (See Minute Order granting ECF 628).
2. Mrs. Meggs continues to seek that modification to allow her travel, but where previously it was for a limited time period of four weeks, now respectfully requests that it continue on an open ended basis, with no specific end date. She returns home each Friday to work on Fridays.
3. The undersigned conferred with AUSA Jeffrey Nestler and the government does not oppose to this request.
4. Pretrial Services approves this request.
5. Connie Meggs' parents are senior, her father is ninety-four (94) years old and now on Hospice. Connie visits to assist her mom.
6. Connie Meggs is planning to travel by automobile, about three-three and half hours, to her parents' home in Boynton Beach, Florida where she would spend three to four nights a week.
7. Undersigned counsel has provided the government has the residential address.
8. All other conditions shall remain the same.

WHEREFORE, Connie Meggs respectfully moves that this Honorable Court modify its Order Setting Conditions of Release to authorize Mrs. Meggs to travel out of town, to stay three to four nights a week, on an on-going and continuous basis with her parents in Florida.

Dated: March 23, 2022

Respectfully submitted,

/s/ Juli Z. Haller

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CERTIFICATE OF SERVICE

On March 22, 2022, the undersigned hereby certifies that a true and correct copy of the foregoing was electronically filed and served via the CM/ECF system, which will automatically send electronic notification of such filing to all registered parties.

Respectfully submitted,

 /s/ Juli Z. Haller
Juli Z. Haller