

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.	:	June 14, 2021
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MOTION TO MODIFY CONDITIONS OF RELEASE

The Defendant Patrick McCaughey III respectfully moves that his conditions of release be modified such that he be: (a) placed on a 7:00am-9:00pm curfew – maintaining GPS monitoring – in lieu of home detention, and (b) allowed to travel though the Southern District of New York for purposes of going to and from work.

The curfew request, which is actually made at the suggestion of the defendant’s supervising U.S. Pretrial Services Officer Michael Jones, is due to the fact that the current “home confinement” parameters do not have the flexibility necessary to accommodate the defendants job requirements, *i.e.*, leaving construction job sites to pick up lumber and other materials, tools, etc. The reason for the travel request is that the defendant and his employer father live and work in towns that border the State of New York and the defendant has been compelled to drive circuitous routes to stay withing the confines of his current restrictions.

Both USPO Jones and the Government are in agreement with these requests.

Dated: Stamford, Connecticut
June 14th, 2021

By:  _____

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed and served electronically on all parties of record, on this 14th day of June in the year of our Lord 2021.



Lindy R. Urso