

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____)	
UNITED STATES OF AMERICA)	
)	No. 1:21-CR-596-BAH
v.)	
)	
JEAN LAVIN)	April 26, 2022
_____)	

**DEFENDANT’S UNOPPOSED
MOTION TO AMEND CONDITIONS OF PROBATION**

Defendant Jean Lavin respectfully requests that the Court modify the conditions of her probation so that she serves three intermittent periods of confinement in prison of 3, 3, and 4 days rather than the 5 weekends imposed by the Court. See Judgment, ECF No. 72, at 5, Special Conditions of Supervision. Ms. Lavin’s parents need her assistance on a regular basis, especially given her father’s declining health. This amendment would enable her to reduce the number of spans where she is unavailable, yet still amount to the same total term of confinement.

On Friday, April 22, 2022, Ms. Lavin appeared before the Court for sentencing. The Court imposed a three-year term of probation that includes special conditions that she “serve a total of 10 days of intermittent confinement . . . served in 5 consecutive weekends in a facility designated by the Bureau of Prisons,” along with 60 days of location monitoring and home confinement. That afternoon, Ms. Lavin returned to Connecticut, and she has since discussed implementation of her home detention conditions with the U.S. Probation Office. Meanwhile, Ms. Lavin is awaiting word from the BOP about her reporting obligations, including the location and first date to report.

In reviewing her obligations, there is concern that her unavailability over 5 weekends could significantly impact her parents. Her father has dementia, and Ms. Lavin takes him to various doctors appointments regularly. See PSR, ¶ 36. The current schedule would effectively make Ms. Lavin unavailable to her parents for 5 consecutive weeks due to work obligations and serving the periods of confinement during the weekends. Although her home detention may eliminate Ms. Lavin's ability to take him to the doctor, if she is home, she can at least take him into her home and care for him so as to enable her mother to have time to accomplish household matters.

The alternate plan of Ms. Lavin serving three periods of 3, 3, and 4 days, albeit over the weekend, would enable her to be available to her parents sooner. At the same time, she would serve the same total time ordered by the Court. That approach would still serve the purposes of sentencing.

The Government has no objection to the proposed modification.

The supervising probation officer has no objection to the proposed modification.

WHEREFORE, Ms. Lavin requests that the Court grant this motion and modify the terms of her probation so that she is confined for 3, 3, and 4 days over three consecutive weekends, in lieu of five 2-day periods.

Respectfully submitted,
JEAN LAVIN

/s/Charles F. Willson/s/
By Charles F. Willson (# ct24129)
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CERTIFICATION OF SERVICE

This is to certify that on April 26, 2022, a copy of the foregoing was filed with the Court via the CM/ECF system, by which counsel to all parties, including the Government, will be notified of and have the opportunity to review this filing.

/s/Charles F. Willson/s/
Charles F. Willson