

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF COLUMBIA

UNITED STATES OF
AMERICA

V.

STEVEN PHILLIP
CAPPUCCIO

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CAUSE NO. 21-CR-40-08-
TNM

**STEVEN CAPPUCCIO’S MOTION TO AMEND BOND
CONDITIONS**

Steven Phillip Cappuccio (“Mr. Cappuccio”), through counsel, respectfully moves this Court for an Order modifying conditions of release. Mr. Cappuccio is requesting to travel to Houston, Texas to visit his family for Thanksgiving.

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In support of this Motion, counsel states:

1. Mr. Cappuccio was arrested in his home in Universal City, Texas on August 10, 2021. *See* Arrest Warrant, Doc. No. 106, 107. Mr. Cappuccio was released on a personal recognizance bond. Doc. No. 117.
2. Since his release Mr. Cappuccio has incurred no violations.
3. Mr. Cappuccio would like to visit Houston, Texas to spend Thanksgiving with family and will be traveling to Houston on November 22, 2022. He and his family will be there until November 26, staying at 14727 E. Apricot Blush ct. Cypress, Texas 77433.

4. Michael Perez, United Pretrial Service Officer, San Antonio division, does not oppose this request.
5. John Copes, United Pretrial Service Office for the District of Columbia, does not oppose this request.
6. Kimberly Paschall, Assistant United States Attorney, does not oppose this request.

Conclusion

For the reasons stated herein and any others that appear to the Court, Mr. Cappuccio respectfully moves the Court to amend his conditions of bond to allow Mr. Cappuccio to travel to Houston, Texas for Thanksgiving. A proposed Order is attached for the Court's review.

Respectfully submitted,

MAUREEN SCOTT FRANCO
Federal Public Defender

/s/ MARINA-THAIS DOUENAT
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CERTIFICATE OF SERVICE

I, Marina-Thais Douenat, Assistant Federal Public Defender for the Western District of Texas, hereby certify that on the 9st day of November 2022 filed the foregoing pleading with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

/s/ MARINA-THAIS DOUENAT
Assistant Federal Public Defender

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