

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

UNITED STATES

*

vs.

* Case No.: 21-CR-28-APM

THOMAS EDWARD CALDWELL

*

* * * * *

UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE

COMES NOW the Defendant, Thomas Caldwell, by and through counsel, and without objection from the Government, and requests that this Honorable Court amend his Conditions of Release, and in support of said motion states as follows:

- 1) Pursuant to telephone and email communications on March 29, 2021 with Assistant United States Attorney Kathryn Rakoczy, the Government does not oppose the requested amendment to the Defendant’s Conditions of Release.
- 2) Pursuant to email communications on March 29, 2021, the Defendant’s Pretrial Services Monitor, Officer Sara Morehead, does not oppose the instant requested relief.
- 3) On March 12, 2021, the Court, upon reconsideration, agreed to release the Defendant from detention on very strict conditions, including 24/7 home incarceration. ECF No. 75. The Defendant was also placed on GPS tracking. Id.
- 4) The Defendant requests permission to attend Sunday church services beginning this weekend, Easter Sunday, which begin at 11 a.m. and last no more than two hours. Undersigned counsel has provided the Government and Pretrial Services with the church’s name, address, and contact information. The Defendant’s church is a short drive from his home.

- 5) The Defendant agrees to be accompanied by his wife, Sharon Caldwell, to church each Sunday and will provide the Pretrial Services Office with proof of his attendance if the instant request is granted.
- 6) The Defendant has been fully compliant with his Conditions of Release to date.

WHEREFORE, the Defendant requests that the Court authorize his release from 24/7 home incarceration each Sunday for the purpose of attending church services as approved and verified by Pretrial Services.

/s/
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