

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

UNITED STATES

v.

YOUNG

Case No. 1:23-cv-241

MOTION TO MODIFY CONDITIONS OF RELEASE

Defendant Cindy Young, by and through counsel, hereby requests that the Court modify her conditions of release to allow her to travel to Washington, D.C. on January 20, 2025, to attend the inauguration ceremony of President Trump. For well over a year she has complied with her conditions of release. She poses no threat of danger to the community and she is not a risk of flight. She was allowed to travel several times to Washington, D.C., including to the Capitol building while preparing for trial and there were no incidents. She was in Washington, D.C. for her trial every day for a week and there were no incidents.

For those reasons, Ms. Young respectfully requests that she be allowed to travel to Washington, D.C. to attend the inauguration of President Trump.

Dated: December 11, 2024,

Respectfully submitted

/s/ Jonathan Gross

Jonathan Gross

Bar ID MD0162

2833 Smith Ave, Suite 331

Baltimore, MD 21209

(443) 813-0141

jonathansgross@gmail.com

Counsel for Cindy Young

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing is being served on opposing counsel via email on

December 11, 2024.

/s/ Jonathan Gross