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**ADMITTED TO PRACTICE**  
New York State  
Eastern District of New York  
Southern District of New York  
Second Circuit Court of Appeals

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July 19, 2023

**VIA: ECF**

The Honorable Anne Y. Shields  
United States Magistrate Judge  
Eastern District of New York  
100 Federal Plaza, Courtroom 840  
Central Islip, New York 11722

Re: *U.S. v. George Anthony Devolder Santos*, 23-CR-197(JS)(AYS)  
Defendant's letter-motion seeking modification of the conditions of release.

Dear Judge Shields,

On behalf of Congressman George Santos, I respectfully request to modify the conditions of my client's release, by extending the geographical area in which my client can travel, without providing advance notice to the government and pretrial services, to include a thirty-mile radius of the District of Columbia. Our good faith basis for this request is as follows.

On May 10, 2023, Congressman Santos voluntarily surrendered to law enforcement, was subsequently arraigned upon the indictment filed in this case and entered a plea of not guilty, before this Court. Your Honor released Congressman Santos on a \$500,000.00 unsecured appearance bond which was subsequently cosigned by two financially responsible family members. Your Honor further executed an order setting down additional conditions of release (Docket Entry ["DE"] No. 12) including, among other things, within paragraph (7)(d) that my client is restricted to New York City, Long Island, and District of Columbia, but may travel in the continental United States with advance notice to the government and Pretrial Services.

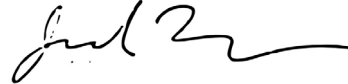
On May 30, 2023, defendant filed a previous motion to modify the conditions of his release to reduce the number of financially responsible people required to co-sign the appearance bond from three to two (DE No. 21), which was without objection by the government and later adopted by this Court in footnote one of the Court's June 6, 2023 Order (DE No. 22) on the motion to unseal the suretors and related proceedings by intervening members of the press. Defendant also moved to modify the conditions of his release, by way of review of this Court's June 6, 2023 Order, which was denied by Judge Seybert on June 20, 2023 (DE No.27). This is therefore defendant's third request to modify the conditions of defendant's release in which we seek to extend the geographical area in which my client can be at liberty without prior notice to

the government and Pretrial Services. Both the government and Pretrial Services have been consulted and have no objection to this request.

In light of the small geographical area of the District of Columbia, there is a frequent need to travel outside the District of Columbia for usual and customary functions of someone who lives and works in the District of Columbia, such as dining, shopping, meetings, events, and even use of the local airports. This has resulted in unnecessary notifications which can easily be remedied by extending the geographical area in which my client can freely move about without providing prior notice, to include a thirty-mile radius around the District of Columbia.

Accordingly, defendant respectfully requests that the Court grant our request to modify the conditions of defendant's release to include a thirty-mile radius of the District of Columbia in which defendant may travel without prior notice to the government and Pretrial Services.

Respectfully,

A handwritten signature in black ink, appearing to read 'J. Murray', with a long, sweeping horizontal line extending to the right.

Joseph W. Murray, Esq.

Cc: All parties via ECF