

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

**UNITED STATES OF AMERICA**

**v.**

**Case No.: 21-cr-28(APM)**

**CONNIE MEGGS**  
\_\_\_\_\_ /

**MOTION TO MODIFY CONDITIONS OF RELEASE**

COMES NOW the Defendant, CONNIE MEGGS, through undersigned counsel, and moves this Honorable Court for an Order modifying Ms. Meggs' previously-imposed conditions of Pre-Trial Release to remove the condition of home incarceration and substitute a less-restrictive condition of home detention. As grounds in support, Ms. Meggs states the following:

1. Ms. Meggs is charged with crimes allegedly committed at the United States Capital in Washington on January 6, 2021. In a Third Superseding Indictment, filed March 31, 2021, Ms. Meggs is charged with conspiracy against the United States government in violation of Title 18 U.S.C. § 371; obstruction of an official proceeding in violation of Title 18 U.S.C. § 1512(c)(2); destruction of government property in violation of Title U.S.C. 18 § 1361; and entering and remaining in a restricted building or grounds access in contravention of Title 18 U.S.C. § 1752(a)(1). Doc. 127.

2. On March 26, 2021, this Court entered an order setting conditions of pretrial release for Ms. Meggs. In addition to the standard conditions, this Court

ordered that Ms. Meggs be placed on home incarceration, which requires that she be restricted to her residence 24-hours a day, except for medical necessities, court appearances, and other activities specifically approved by the Court. Doc. 114.

3. On March 30, 2021, this Court granted an unopposed request by Ms. Meggs to modify her conditions of home confinement to allow her to attend religious services between the hours of 11:00 a.m. and 1:00 p.m. on Sundays. Doc. 117.

4. Ms. Meggs lives in a rural area and has the responsibility for the care of livestock and a number of domestic animals on her property. The current home incarceration restriction does not permit Ms. Meggs to leave her residence for the purpose of going outside to care for her animals. The current restrictions on Ms. Meggs' bond also do not allow Ms. Meggs to leave her residence for the purpose of buying necessary items to care for her animals or to grocery shop for herself. Ms. Meggs has also been prevented from seeking employment.

5. The United States Pre-Trial Services Officer assigned to supervise Ms. Meggs has informed undersigned counsel that Ms. Meggs has complied with all the Court's conditions of her pre-trial release and that she has had no violations. Under these circumstances, Ms. Meggs requests that this Court impose the less-restrictive condition of home detention, continuing with the GPS monitor. The Pre-Trial Services Officer has informed counsel that this less-restrictive condition will allow the Pre-Trial Services Officer to adjust the GPS monitor to the perimeters of Ms. Meggs' property line, so that she may care for

her animals. The Pre-Trial Services Officer will also have the authority to supervise and approve any activities or employment sought by Ms. Meggs.

6. All other conditions of Ms. Meggs' pretrial release will remain in place, including no travel outside the Middle District of Florida, with the exception of Court appearances, no contact with Oath Keepers, and no access to computers, smartphones, tablets or any device that would allow her to communicate through either encrypted or non-encrypted applications.

7. Undersigned counsel has spoken with Assistant United States Attorney Jeffrey S. Nestler Esq., who represents the Government in this matter, and he has advised that the Government opposes relaxing Ms. Meggs' terms of release from home incarceration to home detention, but does not oppose Pre-Trial Services modifying the geographic boundaries of her GPS monitoring to the outer bounds of her property line (rather than the limited area of her physical house).

#### MEMORANDUM OF LAW

The granting of this motion is within the sound discretion of the Court.

WHEREFORE, the Defendant, CONNIE MEGGS, respectfully requests that the conditions of her pretrial release be modified to the less-restrictive condition of home detention.

DATED this 28<sup>th</sup> day May, 2021.

Respectfully submitted,

/s/Mary K. Anderson

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Attorney for Connie Meggs

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 28<sup>th</sup> day of May, 2021, a true and correct copy of the foregoing was filed with the Clerk of the Court using the CM/ECF system, which will send notice of the electronic filing to: AUSA Jeffrey S. Nestler, Esq.

/s/ Mary Anderson

Mary Anderson