

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

V.

DAVID BUTZIGER

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Case No.: 1:20-MJ-33-LDA

DEFENDANT'S MOTION TO MODIFY CONDITIONS

Now comes Defendant, David Butziger, by and through counsel, and hereby moves this Honorable Court to modify the conditions of his release to allow him to travel to Albany, New York on May 29, 2020, for the purpose of employment. As grounds for this request, Mr. Butziger avers the following:

1. Mr. Butziger is charged with Conspiracy to Make False Statement to Influence the SBA, in violation of 18 U.S.C. § 371; Conspiracy to Commit Bank Fraud, in violation of 18 U.S.C. § 1349; and Bank Fraud, in violation of 18 U.S.C. § 1344 (2).
2. He initially appeared, telephonically, before the Court on May 5, 2020, and was released on \$10,000.00 unsecured bond with conditions that include restricting his travel to the District of Rhode Island.
3. Mr. Butziger is the owner and operator of Dock Wireless, located at 44 Bowen Briggs Avenue, Warwick, RI 02886. This company specializes in telecommunication services and full-service wireless internet networks for boats and marinas.
4. This business also provides drug and alcohol testing for marine professionals.
5. Mr. Butziger seeks permission from to Court to travel to Albany, New York on May 29, 2020, for the purpose of collecting urine specimens (Attachment A). This is related to a new work order that his company recently received.
6. Mr. Butziger is in full compliance with all the terms and conditions of his release.
7. The government has no objection to this modification request.

8. Based upon the foregoing, Mr. Butziger asks to this motion be granted to modify his conditions of release to allow travel into New York for employment purposes.

Respectfully submitted this 19th day of May 2020.

Respectfully submitted
DAVID BUTZIGER
By his Counsel,

/s/ John L. Calcagni III, Esq.
John L. Calcagni III (# 6809)
One Custom House Street, Suite 300
Providence, RI 02903
Phone: (401) 351.5100
Fax: (401) 351.5101
Email: jc@calcagnilaw.com

CERTIFICATION

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered Participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as nonregistered participants on May 19, 2020.

/s/ John L. Calcagni III, Esq.
John L. Calcagni III (# 6809)
Law Office of John L. Calcagni III, Inc.
One Custom House Street, Suite 300
Providence, RI 02903
Phone: (401) 351.5100
Fax: (401) 351.5101
Email: jc@calcagnilaw.com