

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA	:	
	:	
V.	:	CASE NO.: 1:20-CR-00072-MSM-LDA
	:	
DAVID BUTZIGER	:	

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 into all of the East Coast states, and Pennsylvania, for the purpose of employment. As grounds for this request, Mr. Butziger avers the following:

1. Mr. Butziger was originally 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. He waived his right to a preliminary hearing on June 12, 2020 and was eventually charged, on August 27, 2020, by way of information with Conspiracy to Commit Bank Fraud, in violation of 18 U.S.C. § 1349. He entered into a plea agreement with the government on this same date. His matter has yet to be scheduled for arraignment.
4. 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.
5. This business also provides drug and alcohol testing for marine professionals. Often, he receives emergency requests for out of state testing. Because of his restrictions, he is

unable to confirm and attend these appointments until he receives permission for the Court. This also results in numerous, last minute motions being filed by the defense to address new work orders.

6. The Court formerly authorized Mr. Butziger to travel to Massachusetts, Connecticut, New York, New Hampshire and Maine, for employment purposes, providing he provides advance notice to his attorney and U.S. Probation before leaving, and confirms his return.
7. Mr. Butziger continues to be in full compliance with all the terms of his release.
8. He now petitions this court to extend his conditions to allow him to travel to all East Coast states, including New Jersey, Pennsylvania and Georgia, for the purpose of employment.
9. The government has no objection to this modification request.
10. Based upon the foregoing, Mr. Butziger asks to this motion be granted to modify his conditions of release to allow travel into other states for employment purposes.

Respectfully submitted this 10th day of September 2020.

Respectfully submitted
DAVID BUTZIGER
By his Counsel,

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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 September 10, 2020.

/s/ John L. Calcagni III, Esq.

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