

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)
)
v.) 23 CR 97
) Hon. Elaine E. Bucklo
)
CHRISTOPHER SCOTT.)

**CHRISTOPHER SCOTT'S UNOPPOSED MOTION
TO MODIFY CONDITIONS OF RELEASE**

NOW COMES Defendant CHRISTOPHER SCOTT, and respectfully requests that this honorable court modify the conditions of his pre-trial release and permit him to travel to Miami, Florida between November 13, 2023, returning November 15, 2023; and November 17, 2023 through November 20, 2023 to Orlando, Florida. In support of his motion, Mr. Scott states the following.

1. On March 1, 2023, Mr. Scott plead not guilty to an indictment charging him with wire and bank fraud.
2. Mr. Scott has scheduled a business trip with his wife to Miami, Florida between November 13, 2023 through November 15, 2023. He also requests permission to travel to Orlando, Florida between November 17, 2023, returning November 20, 2023.
3. The Government does not object to this request.

4. Pre-Trial does not object.
5. Additionally, Mr. Scott respectfully requests that Pre-Trial be permitted to approve future travel requests without a formal motion. Pre-Trial Services does not object to this modification.
6. The Government does not object to this modification.

WHEREFORE, Mr. Scott respectfully requests that this honorable court modify the conditions of his release and permit him to travel to Atlanta, Georgia, and Jackson Mississippi, and to also modify his conditions to permit future travel requests without a formal motion within the continental United States as approved by Pre-Trial Services.

Respectfully submitted,

/s/Joshua B. Adams
Joshua B. Adams
Attorney for Christopher Scott

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CERTIFICATE OF SERVICE

I, Joshua B. Adams, an attorney, certify that I caused a copy of the above **MOTION TO MODIFY CONDITIONS OF RELEASE** to be served on December 14, 2023, in accordance with Fed.R.Crim.P. 49, Fed.R.Civ.P. 5, LR 5.5 and the General Order on Electronic Case Filing (ECF) pursuant to the district court's system as to ECF filers.

/s/Joshua B. Adams
Joshua B. Adams