

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

v.

CHYNNA SAVATH,
Defendant.

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) Criminal No.: 1:21-CR-10269
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**DEFENDANT'S ASSENTED-TO MOTION TO
MODIFY HER CONDITIONS OF RELEASE**

Undersigned counsel for the Defendant Chynna Savath hereby moves this Court for an Order allowing her to travel from her current residence in New York to New Jersey for two days and one overnight, on April 29-30, 2022.

In support of this Motion, undersigned counsel states as follows:

1. On January 20, 2022, Defendant plead guilty to two counts of wire fraud in violation of 18 U.S.C. § 1343. Pursuant to a Rule(c)(1)(C) plea agreement, the parties have agreed to a sentencing in this case of 36 months of probation, restitution, forfeiture, and the required special assessment. Defendant's sentencing is currently scheduled for May 19, 2022.
2. Also on January 20, 2022, this Court released Defendant's pending sentencing on a series of conditions, including a requirement that her travel be limited to the states of Massachusetts, Rhode Island, Connecticut and New York. *See* Docket Entry #11. Since that date, Defendant has been in compliance with all conditions of her release.

3. Defendant is currently residing in the state of New York, where she is being supervised directly by the United States Pretrial Services Office for the Southern District of New York.
4. Defendant's sister, who resides in Washington State, is planning to visit Defendant in New York during the weekend of April 29-May 1, 2022. The two hope to travel together to spend an overnight in Atlantic City, New Jersey on April 29-30, 2022.
5. Defendant has informed her supervising Pretrial Services Officer about her proposed travel plans to New Jersey on April 29-30, 2022, and the Pretrial Services Office has stated that it does not object to those proposed travel plans.
6. Undersigned counsel has conferred with counsel for the United States regarding Defendant's proposed travel plans to New Jersey. Counsel for the United States does not object to Defendant's proposed travel plans.

WHEREFORE, Defendant respectfully requests that this Court issue an Order modifying its Conditions of Pretrial Release in order to allow Defendant to travel to the State of New Jersey on April 29-30, 2022.

Respectfully submitted,
DEFENDANT, CHYNNA SAVATH,
By her attorney,

/s/ Daniel J. Cloherty
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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I served a true copy of the above document upon all parties with an interest in this matter by electronically filing through this Court's CM/ECF filing system this 28th day of April, 2022.

/s/ Daniel J. Cloherty
Daniel J. Cloherty