IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

ATLANTA DIVISION

UNITED STATES OF AMERICA	)	
	)	
	)	
v.	)	1:20-CR-228-2 (MHC) (JKL)
	)	
	)	
DANIEL ERIC JAY	)	
_____	)	

UNOPPOSED MOTION TO MODIFY CONDITIONS OF BOND

COMES NOW DANIEL ERIC JAY, by and through the undersigned attorney, pursuant to 18 U.S.C. Section 3145 (a)(2), and respectfully petitions this Honorable Court to modify the conditions of his release while he is awaiting trial on the above-styled case. Specifically, Mr. Jay asks that his travel restrictions be amended to allow him to travel into the adjacent Northern District of Ohio. In support of this motion DANIEL JAY shows as follows:

1.

On July 15, 2020, DANIEL JAY came before the Honorable Maureen P. Kelly in the Western District of Pennsylvania and was GRANTED a bond with conditions which included travel restrictions to the Western District of Pennsylvania and the Northern District of Georgia (for court appearances). (Doc.

4-7, p.2). Mr. Jay made his initial appearance in this district by video before Judge Baverman on July 20, 2020. (Doc. 6). Mr. Jay has been home in the Western District of Pennsylvania on said bond since July 15, 2020.

2.

In or about September of 2020, Mr. Jay moved back in with his ailing father in BESSEMER, PA, and became his care-giver. In June of 2021, Mr. Jay's father had a foot amputated. He is scheduled to move to a medical rehabilitation facility soon. BESSEMER, PA**, is located on the boarder of the Western District of Pennsylvania and the Northern District of Ohio.** Mr. Jay's father is scheduled to move to a medial rehabilitation facility located in the Northern District of Ohio. Furthermore, the closest shopping centers for purchasing food, home and medical supplies are located just across the border from Bessemer, PA, in Northern Ohio, as are most doctors' offices and facilities.

3.

Thus, Mr. Jay asks to be allowed to travel into the Northern District of Ohio, as well as the Western District of Pennsylvania.

4.

Undersigned counsel has spoken with Mr. Jay's U.S. Probation Officer, PETER GAWLINSKI, in the Western District of Pennsylvania. He does not

oppose Mr. Jay's request and believes it makes logistical sense in light of where Mr. Jay resides (right on the border). The Probation Officer has **no objection** to Mr. Jay having his conditions modified in the manner sought.

5.

AUSA RUSSELL PHILLIPS defers to the Probation Officer and does not object to this request.

WHEREBY, DANIEL JAY requests that this Honorable Court modify his conditions of bond to allow him to travel also into the adjoining Northern District of Ohio.

Dated: This 29th day of June, 2021.

Respectfully submitted,

s/ *L. Burton Finlayson*
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Attorney For DANIEL JAY
Georgia Bar Number: 261460

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CERTIFICATE OF SERVICE

This is to certify that I have this day electronically filed the foregoing Motion to Modify Bond with the Clerk of Court using the CM/ECF system which will automatically send email notifications of such filing to all counsel of record including the following:

Mr. Russell Phillips .
Assistant United States Attorney
600 U.S. Courthouse
75 Ted Turner Drive, S. W.
Atlanta, Georgia 30303

DATED: This 29th day of June, 2021.

s/ *L. Burton Finlayson*

L. BURTON FINLAYSON
ATTORNEY FOR DANIEL JAY
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