

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 23-CR-80154-DMM

UNITED STATES OF AMERICA

vs.

GREGORY SCOTT KEOUGH,

Defendant. /

**DEFENDANT'S UNOPPOSED MOTION TO
MODIFY CONDITIONS OF RELEASE**

Greg Scott Keough, through undersigned counsel, respectfully files this unopposed motion to modify conditions of release, that is, modify home confinement to permit a curfew from 10:00 pm to 8:00 am. In support, the Defendant states as follows:

BACKGROUND

1. On August 8, 2023, a Federal complaint was filed against Greg Scott Keough charging him with conspiracy to commit wire fraud, in violation of Title 18, United States Code, Section 1349; wire fraud, in violation of Title 18, United States Code, Section 1343; and engaging in monetary transactions in criminally derived proceeds, in violation of Title 18, United States Code, Section 1957(a) (DE 3).

2. On August 9, 2023, the Defendant appeared before U.S. Magistrate Judge William Matthewman for his initial appearance and was advised of the pending charges (DE10).

3. On August 24, 2023, a Federal Grand Jury sitting in the Southern District of Florida, returned an eleven-count Indictment charging Greg Scott Keough with conspiracy to commit wire fraud, in violation of Title 18, United States Code, Section 1349 (Count 1); wire fraud, in violation of Title 18, United States Code, Section 1343 (Counts 2-7); and engaging in monetary transactions in

criminally derived proceeds, in violation of Title 18, United States Code, Section 1957(a) (Counts 8-11)(DE 17).

4. At the government's request for pre-trial detention, the Court held a detention hearing on August 25, 2023, which was continued on August 31, 2023, and September 6, 2023 (DE 14, 23, 26).

5. At the conclusion of the detention hearing, the Court entered a \$1,500,000 personal surety bond and \$1,500,000 corporate surety bond with co-signers (DE 26). Along with the standard conditions, the Court also imposed special conditions, which included GPS monitoring and home detention (DE 28, 29).

6. On November 13, 2023, without the benefit of a written plea agreement, Greg Scott Keough entered a change of plea as to Counts 4, 5 and 8 of the Indictment (DE 43). Sentencing in this matter is scheduled for February 8, 2024 (DE 44).

7. The undersigned counsel represents that Greg Scott Keough has been in compliance with all conditions of release. Further, on November 13, 2023, counsel conferred with the government and the assigned Probation Officer Lucien Michel, re: modification of bond conditions. P.O. Lucien Michel recommended a modification of home detention to include a curfew to the residence on record from 10:00 pm to 8:00 am, or as directed by the supervising officer. The government does not object.

8. As a part of Greg Scott Keough's supervision, he is obligated to provide Probation each Tuesday, a schedule for the following 7-day week commencing Wednesday. Such a requirement has hindered Keough's ability to spontaneously meet with counsel as each counsel becomes available. In light of the Defendant's family members visitation during the holidays, the potential likelihood of Probation's unavailability during the holidays, and the active GPS, the Defendant respectfully requests that the requirement to provide Probation a schedule a week in advance be eliminated. The undersigned counsel has twice attempted contact the assigned

Probation officer; however, counsel has not heard back as to Probation's position. The government indicates that it would defer to Probation and the Court regarding this condition.

DISCUSSION

Although the Court found Defendant Greg Keough a risk of flight, the Court also determined that conditions of release could be fashioned to ensure the Defendant's appearance in court. The Court, having entered a bond, the Defendant was released and has been in compliance with all the conditions of release. With the impending holidays, Greg Scott Keough anticipates engaging with various family members, to include participating in family events in the evening hours. Greg Scott Keough will remain on GPS monitoring and only wishes to take part with family, who intends to visit with the Defendant. The modification sought will not hinder Probation's ability to monitor the Defendant.

WHEREFORE, the Defendant respectfully request that the Court grant the unopposed motion to modify the conditions of release to include curfew of 10:00 pm to 8:00 am, as a part of home confinement.

Respectfully submitted,

/s/ David J. Joffe

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CERTIFICATE OF SERVICE

The Defendant certifies that on November 20, 2023, a copy of the foregoing document was filed electronically with the Clerk of the Court using CM/ECF.

/s/ David Joffe
DAVID JOFFE
Counsel for Defendant