

**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 (DE 10).

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. On November 21, 2023, this Court granted Greg Scott Keough's Unopposed Motion to Modify Conditions of Release as follows: "The Home Detention component of Defendant's release conditions is hereby terminated. In lieu of Home Detention, a daily curfew of 10:00 p.m. to 8:00 a.m. is hereby imposed. Defendant shall at all times be at his approved place of residence each day between 10:00 p.m. and 8:00 a.m." (DE 47).

8. Greg Scott Keough respectfully requests the modification of his conditions of release as follows: daily curfew at his place of residence between 12:00 a.m. and 8:00 a.m.

9. The undersigned counsels represent that Greg Scott Keough has been in compliance with all conditions of release.

10. AUSA Robin Waugh and Greg Scott Keough's probation officer, Lucien Michel, have no objection to the modification of the pretrial release.

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 requests that the Court grant the unopposed motion to modify the conditions of release to include curfew of 12:00 a.m. to 8:00 a.m., as a part of home confinement.

Respectfully submitted,

/s/ David J. Joffe

DAVID JONATHAN JOFFE

Attorney for Defendant

Florida Bar #: 814164

110 SE 6th Street, Ste 1700

Fort Lauderdale, FL 33301

Tel: (954) 723-0007

Fax: (954) 723-0033

/s/ Patrick R. McKamey

PATRICK R. McKAMEY

Attorney for Defendant

Florida Bar #: 103624

515 N. Flagler Dr. Ste P300

West Palm Beach, FL 33401

Tel: (561) 370-7424

Fax: (561) 370-7401

CERTIFICATE OF SERVICE

The Defendant certifies that on December 21, 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