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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

CASE NO. 9:23-CR-80154-DMM-1

UNITED STATES OF AMERICA,

Plaintiff,

v.

GREGORY SCOTT KEOUGH,

Defendant.

**DEFENDANT’S MEMORANDUM OF LAW IN SUPPORT OF
MOTION TO MODIFY CONDITIONS OF SUPERVISED RELEASE**

Defendant Gregory Scott Keough (“Mr. Keough”), by and through undersigned counsel, respectfully submits this Memorandum of Law in Support of Motion to Modify Conditions of Supervised Release. Mr. Keough seeks to modify his supervised release conditions to (a) become non-reporting and (b) remove the drug testing requirement, and in support thereof states as follows:

INTRODUCTION

Mr. Keough has an opportunity to renew the life he regretfully derailed when he committed his crimes. But this life is in San Salvador, El Salvador, not the United States. Given his unique personal circumstances, Mr. Keough’s current supervised release conditions effectively shackle

him in a country he no longer calls home. Recent amendments to the Sentencing Guidelines encourage courts to avoid such predicaments. As such, the Court should modify the conditions of Mr. Keough's supervised release to allow him to rejoin his family in El Salvador, cease reporting to the United States Probation Office, and remove the drug testing requirement.

BACKGROUND

Mr. Keough pled guilty in November 2023 to two counts of wire fraud, 18 U.S.C. § 1343, and one count of money laundering, 18 U.S.C. 1957(a). *See* Judgment 1, ECF No. 60. The Court sentenced him to thirty months imprisonment, followed by a three-year term of supervised release. *Id.* at 2-3. Mr. Keough voluntarily reported to prison on or around March 25, 2024. Declaration of Gregory Scott Keough ("Keough Declaration") ¶ 2. He was released to a halfway house on May 21, 2025, and currently is under home confinement at a rental property in Wellington, Florida. Keough Decl. ¶¶ 3, 5.

As part of his sentence, the Court imposed "mandatory" conditions of supervised release. Judgment 3, ECF No. 60. Despite having never abused alcohol, nor experimented with any illicit drugs, *see* Presentence Investigation Report ("PSR") 19-20 ¶¶ 86-87, ECF No. 50, the Court imposed a mandatory condition requiring Mr. Keough to "submit to one drug test within 15 days of release from imprisonment and at least two periodic drug tests thereafter, as determined by the court" (the "Drug Test Condition"), Judgment 3, ECF No. 60. This is despite the fact that the Probation Office determined that Mr. Keough "pose[d] a low risk of future substance abuse." PSR 27 ¶ 125, ECF No. 50. In any event, Mr. Keough has been subjected to three drug tests since his release from prison. Keough Decl. ¶ 3. All drug tests returned negative results for the presence of illicit drugs. *Id.*

The Court also imposed thirteen "standard" conditions of supervised release. *See* Judgment

4, ECF No. 60. Many of the standard conditions require Mr. Keough to report in some way to an officer with the United States Probation Office:

2. After initially reporting to the probation office, you will receive instructions from the court or the probation officer about how and when you must report to the probation officer, and you must report to the probation officer as instructed.

3. You must not knowingly leave the federal judicial district where you are authorized to reside without first getting permission from the court or the probation officer.

...

5. You must live at a place approved by the probation officer. If you plan to change where you live or anything about your living arrangements (such as the people you live with), you must notify the probation officer at least 10 days before the change. If notifying the probation officer in advance is not possible due to unanticipated circumstances, you must notify the probation officer within 72 hours of becoming aware of a change or expected change.

6. You must allow the probation officer to visit you at any time at your home or elsewhere, and you must permit the probation officer to take any items prohibited by the conditions of your supervision that he or she observes in plain view.

(collectively, the “Reporting Conditions”). *Id.*

Finally, the Court imposed four “special” conditions of supervised release. *See* Judgment 5, ECF No. 60. These conditions: (1) prohibit Mr. Keough from associating with his partner in crime, Derek Acree; (2) require complete financial disclosure to the United States Probation Office; (3) subject Mr. Keough to periodic searches of his person or property; and (4) require Mr. Keough pay unpaid fines and restitution. *See id.*

Mr. Keough’s unique personal circumstances clash with these conditions. In fact, Mr. Keough’s life is not in the United States; Ana, his wife of 30 years, is a citizen and resident of El Salvador. PSR 18 ¶ 77, ECF No. 50. The couple have five children, all of whom are also El Salvadoran citizens. *Id.* The family had lived in El Salvador for over two years prior to Mr. Keough’s plea, and had intended to settle in San Salvador, El Salvador permanently. *See* Keough Decl. ¶ 7. Individually Mr. Keough has deep and lengthy ties to El Salvador, having originally arrived there over thirty years ago while serving in the United States Central Intelligence Agency.

See PSR 22 ¶ 98, ECF No. 50. He has lived in El Salvador intermittently for the last ten years as an authorized legal resident. *See* Keough Decl. ¶ 6. All told, he considers El Salvador his home. *Id.* ¶ 14.

Prior to his plea Mr. Keough was working full time in El Salvador and had adequate income to support his family. *See* PSR 20 ¶ 92, 23 ¶ 99, ECF No. 50. Mr. Keough will be able to return to his former work should he be allowed to return to El Salvador. *See id.* at 23 ¶ 99; Keough Decl. ¶ 12. Additionally, the family has no home and owns no real estate in the United States. *See* Keough Decl. ¶ 8. Mr. Keough's one daughter was a college student in the U.S. but is now studying in Spain. *Id.* ¶ 9. His three brothers reside in the United States but are not local to Florida. *See* PSR 17 ¶ 75, ECF No. 50.

Mr. Keough's family struggles without him in El Salvador. His two youngest children are special needs—one has ADD and Dyslexia, and the youngest child has sensory processing disorder, ADHD and is currently undergoing psychiatric and psychological treatment. *See id.* at 18 ¶ 77. In addition, Ana Keough's elderly father passed away unexpectedly. *See* Keough Decl. ¶ 10. As a result, she and Mr. Keough are now the primary care givers for Ana's mother, who is also a citizen of El Salvador. *Id.* The family is currently getting by, but they need Mr. Keough in El Salvador for emotional and financial support. *See id.* ¶ 11. Mr. Keough also needs his family to ease his transition back into civilian life. *Id.*

Seeking familial reunification, Mr. Keough now brings this Motion. Prior to filing the Motion, the United States Probation Office indicated that while they "typically do not recommend non-reporting supervision...it may be appropriate in this case." Declaration of Patrick J. Egan, Esq. ("Egan Declaration") ¶ 3. The United States Attorney's Office objects to the relief sought in this Motion. *Id.* ¶ 4.

LEGAL STANDARD

Courts are empowered to “modify, reduce, or enlarge the conditions of supervised release, at any time prior to the expiration or termination of the term of supervised release....” 18 U.S.C. § 3583(e)(2). The following factors guide the analysis in determining whether modification of supervised release conditions is warranted:

- (1) the nature and circumstances of the offense and the history and characteristics of the defendant (18 U.S.C. § 3553(a)(1));
- (2) the need to afford adequate deterrence to criminal conduct, to protect the public from further crimes of the defendant, and to provide the defendant with needed educational or vocational training, medical care, or other correctional treatment in the most effective manner (18 U.S.C. § 3553(a)(2)(B)–(D));
- (3) the kinds of sentence and the sentencing range established for the applicable category of offense committed by the applicable category of defendant as set forth in the guidelines (18 U.S.C. § 3553(a)(4));
- (4) any pertinent policy statement issued by the Sentencing Commission (18 U.S.C. § 3553(a)(5));
- (5) the need to avoid unwarranted sentence disparities among defendants with similar records who have been found guilty of similar conduct (18 U.S.C. § 3553(a)(6)); and
- (6) the need to provide restitution to any victims of the offense (18 U.S.C. § 3553(a)(7)).

See 18 U.S.C. § 3583(e).

ARGUMENT

Mr. Keough was a first-time offender when he pled guilty to fraud crimes in November 2023. He paid his debt to society—literally and figuratively—by accepting responsibility, serving his time, and fully satisfying restitution and fines prior to sentencing. He is just now reentering society under conditions of supervised release.

Since Mr. Keough’s sentencing, the United States Sentencing Commission amended the Sentencing Guidelines related to supervised release. These Amendments seek to ensure that supervised release is not an alternative form of punishment. Considering these Amendments and Mr. Keough’s unique personal circumstances, the current supervised release conditions imposed on Mr. Keough are punitive and ought to be modified.

Specifically, the Reporting Conditions and Drug Test Condition serve no purpose other than punishment in the case of Mr. Keough. Mr. Keough's entire life is in El Salvador, not Florida, and these conditions effectively render Mr. Keough a prisoner in public life. As such, the Court should modify the conditions of Mr. Keough's supervised release in a manner that renders him "non-reporting" and removes the drug testing requirement, thereby allowing him to relocate to his family in El Salvador.

A. Overview of the Sentencing Guideline Amendments.

It is often said that supervised release "is not a punishment in lieu of incarceration." *United States v. Grunderson*, 511 U.S. 39, 50 (1994). Indeed, supervised release is supposed to "fulfill[] rehabilitative ends, distinct from those served by incarceration" by "provid[ing] individuals with postconfinement assistance." *United States v. Johnson*, 529 U.S. 53, 59-60 (2000).

But since its inception in the Sentencing Reform Act of 1984, supervised release has drifted from these once-lauded principles. Countless studies have shown that supervised release in practice often carries a punitive character when it is imposed *pro forma* without due regard to the unique circumstances of the individual person. *See, e.g., Overview of Probation and Supervised Release Conditions*, U.S. COURTS, at 10 (July 2024), available at, <https://www.uscourts.gov/about-federal-courts/probation-and-pretrial-services/post-conviction-supervision/overview-probation-and-supervised-release-conditions> ("excessive correctional intervention for low-risk defendants may increase the probability of recidivism by disrupting prosocial activities and exposing defendants to antisocial associates."); The Arthur Liman Center for Public Interest Law, *Collecting Conditions: A Snapshot of Supervised Release in 2023 in the U.S. District Court for the District of Connecticut*, YALE LAW SCHOOL, at 19 (Jan. 28, 2025), available at, <https://law.yale.edu/yls-today/news/liman-center-research-helps-inform-proposed->

[federal-sentencing-guidelines-supervised](#) (recognizing that “[t]he statutory purposes for supervised release focus on supporting rehabilitation” but “some conditions may not be relevant to an individual’s flourishing by the time that person is released.”).

Recognizing these problems, the United States Sentencing Commission recently amended the Sentencing Guidelines.¹ *See generally* U.S. Sent’g Comm’n, Amendments to the Sentencing Guidelines (Official Text) (Apr. 30, 2025), <https://www.ussc.gov/guidelines/amendments/adopted-amendments-effective-november-1-2025>. The Amendments serve to refocus courts’ attention to the original purposes of supervised release in several ways that are relevant to Mr. Keough’s circumstances.

First, the Amendments “underscore[] the rehabilitative purposes of supervised release” in part by “remov[ing] the instruction that ‘standard’ conditions are recommended for supervised release....” U.S. Sent’g Comm’n, Amendments to Sentencing Guidelines (“Reader-Friendly” Version) (Apr. 11, 2025), at 31-33, <https://www.ussc.gov/guidelines/amendments/adopted-amendments-effective-november-1-2025> (hereinafter, “Guideline Amendments”). Instead, standard conditions may now “be modified, omitted, or expanded in appropriate cases” and “imposed *only when* authorized by an individualized assessment.” *Id.* at 33 (emphasis added).

Second, the Commission aimed to ensure that such individualized assessment was conducted “as soon as practicable after a defendant’s release from imprisonment.” U.S. Sent’g Comm’n, Proposed Amendments to the Sentencing Guidelines (Preliminary) (Jan. 24, 2025), https://www.ussc.gov/sites/default/files/pdf/amendment-process/reader-friendly-amendments/20250124_prelim_rf.pdf.

¹ Without Congressional action, the Amendments will become effective November 1, 2025. *See* U.S. Sent’g Comm’n, Amendments to the Sentencing Guidelines (Official Text) (Apr. 30, 2025), <https://www.ussc.gov/guidelines/amendments/adopted-amendments-effective-november-1-2025>.

Third, the Amendments added a new §5D1.4 (Modification, Early, Termination, and Extension of Supervised Release (Policy Statement)), which encourages courts to “consider modifying the terms and conditions of supervised release whenever changed individual circumstances so warrant.” Guideline Amendments, at 34.

These Amendments serve to refocus courts’ attention to the original purposes of supervised release—rehabilitation, only when it is necessary. And the Sentencing Commission isn’t alone in this mission. A recent bipartisan coalition in Congress has sought to address similar concerns. *See, e.g.*, Safer Supervision Act of 2023, S. 2681, 118th Cong. (2023) and H.R. 5005, 118th Cong. (1st Sess. 2023). And just this year, the United States Supreme Court did the same. *See Esteras v. United States*, --- U.S. ---, No. 23-7483, 2025 WL 1716137, at *6 (June 20, 2025) (holding that courts may not consider the retributive factor (§ 3553(a)(2)(A)) when determining whether to revoke supervised release).

As discussed below, this renewed focus makes clear that the Reporting Conditions and Drug Test Condition are purposeless in the case of Mr. Keough.

B. The Court Should Modify Mr. Keough’s Supervised Release Conditions.

With the above principles in mind, Courts must make an individualized assessment of the defendant’s circumstances when imposing or modifying conditions of supervised release. *See United States v. Bell*, 915 F.3d 574, 577-78 (8th Cir. 2019). This individualized assessment ensures that supervised release is imposed on those, and only those, who need it. *See, e.g.*, Comm. on the Judiciary, Comprehensive Crime Control Act of 1983, S. Rep. No. 98-225, at 54, 124 (1983) (stating the twin goals of supervised release to “assure that [those] who will need post-release supervision will receive it” while “prevent[ing] probation system resources from being wasted on supervisory services for releasees who do not need them.”).

When considering Mr. Keough's unique circumstances, the Reporting Conditions and Drug Test Condition do not align with the purposes of supervised release. Instead, they only serve to make Mr. Keough a prisoner in a country he no longer calls home. As such, the Court should modify Mr. Keough's supervised release to render him non-reporting and remove the drug testing requirement.

1. The Reporting Conditions Should Be Modified In A Manner That Makes Mr. Keough Non-Reporting And Allows Him To Return To El Salvador.

The Court imposed several "standard" conditions which require Mr. Keough to periodically report in some manner to the United States Probation Office. *See* Judgment 4, ECF No. 60. As noted above, the Sentencing Commission has stated that standard conditions are no longer "recommended" for supervised release but should be "imposed *only when* authorized by an individualized assessment." Guideline Amendments, at 31-33 (emphasis added). An individualized assessment of Mr. Keough's special circumstances make the Reporting Conditions punitive in a manner that is contrary to the reinforced purposes of supervised release that the Guideline Amendments lay out.

Mr. Keough's entire life is in El Salvador, where his wife and five children are all residents and citizens. PSR 18 ¶ 77, ECF No. 50; Keough Decl. ¶¶ 6-8, 13-14. Indeed, Mr. Keough and his family currently have no enduring ties to the United States. *See* Keough Decl. ¶¶ 6-8, 13-14. Requiring Mr. Keough to be confined to Florida is in effect an extension of his prison term when he has no family in the United States to assist him with his reentry into civilian life. It is not possible for his family to relocate here for the duration of his supervised release. The family has no home and owns no property in the United States. *See* Keough Decl. ¶ 8. It would be both unaffordable and extremely disruptive for the family to attempt to relocate here.

Worse, the Reporting Conditions will keep Mr. Keough from his family when they need

him the most. Ana and Mr. Keough's two youngest children are special needs, suffering from various psychosocial and developmental disorders. PSR 18 ¶ 77, ECF No. 50. Mr. Keough's youngest son is currently undergoing treatment for psychiatric disabilities. *Id.* The younger children have been traumatized the most by Mr. Keough's incarceration, and they desperately need reunification with their father. Ana and Mr. Keough are also now the primary care givers for Ana's mother in El Salvador. *See* Keough Decl. ¶ 10. Keeping Mr. Keough in Florida while his family suffers abroad is contrary to the purposes of supervised release, and in fact serves no purpose other than to cause Mr. Keough to suffer alone in the United States.

Moreover, the Reporting Conditions will keep Mr. Keough from meaningfully providing for his family. Due to his status as a convicted felon Mr. Keough has extremely limited employment prospects in the United States. It will be difficult to support his wife and five children on the income he could earn in this country. Mr. Keough was working full time in El Salvador and had adequate income to support his family prior to his plea. PSR 20 ¶ 92, 23 ¶ 99, ECF No. 50. He will be able to return to his former work should he be allowed to return to El Salvador. *See* Keough Decl. ¶ 12. Confining Mr. Keough to Florida will cause him and his family needless financial harm.

To resolve any doubt, reporting supervision is not necessary in the case of Mr. Keough. There are no special conditions for the Probation Office to monitor. *See* Judgment 5, ECF No. 60; *see also* Egan Decl. ¶ 3 (noting that the Probation Office indicated non-reporting supervision "may be appropriate" for Mr. Keough). Nor is there any restitution left to be paid. *See* PSR 15 ¶ 53, ECF No. 50 (noting that, at the time of the PSR's submission, Mr. Keough was responsible for only \$77.16 in restitution); Keough Decl. ¶ 15. Considering that monitoring is therefore unneeded in the case of Mr. Keough, the Reporting Conditions have no purpose, not even in a rehabilitative

sense. *See* Comm. on the Judiciary, Comprehensive Crime Control Act of 1983, S. Rep. No. 98-225, at 54, 124 (1983) (recognizing the primary purpose of supervised release is “to provide rehabilitation to a defendant who has spent a fairly short period in prison.”).

The Court should therefore modify the conditions of Mr. Keough’s supervised release to render him non-reporting to the United States Probation Office.

2. The Drug Test Condition Serves No Purpose And Should Be Terminated.

The Drug Test Condition is a mandatory condition of supervised release. *See* Judgment 3, ECF No. 60. But courts may modify mandatory aspects of supervised release if an individualized assessment so warrants. *See United States v. Spinnelle*, 41 F.3d 1056, 1060 (6th Cir. 1994) (recognizing that “the sentencing phase is different than post-sentence modification” and holding that a district court may terminate a mandatory term of supervised release because § 3583(e) draws no explicit distinction between mandatory and discretionary terms of supervised release).

Mr. Keough has never abused alcohol, nor experimented with any illicit drugs. *See* PSR, 19-20 ¶¶ 86-87, ECF No. 50; Keough Decl. ¶ 4. In fact, while the Court at sentencing ultimately imposed the Drug Test Condition, the PSR recommended it be suspended based on the Probation Office’s determination that Mr. Keough “pose[d] a low risk of future substance abuse.” PSR 27 ¶ 125, ECF No. 50. The Drug Test Condition accordingly serves no purpose in Mr. Keough’s case. This condition should therefore be terminated.²

CONCLUSION

Recent Sentencing Guideline amendments refocus the Court’s attention to the need to tailor

² Nevertheless, Mr. Keough has satisfied the Drug Test Condition as dictated by the Court’s Judgment. The Judgment required “one drug test within 15 days of release from imprisonment and at least two periodic drug tests thereafter, as determined by the court.” Judgment 3, ECF No. 60. Mr. Keough submitted to his first drug test upon arrival at a halfway house and has since had two drug tests thereafter. Keough Decl. ¶ 3. All tests were negative for the presence of illicit drugs. *Id.*

supervised release to the individual circumstances of each person before it. In Mr. Keough's case, the Reporting Conditions and Drug Test Conditions are punitive and contrary to the renewed purposes of supervised release. These conditions are keeping Mr. Keough from his lifeline—his family in El Salvador—at a time when the family desperately needs reunification. Seeing that there are no outstanding obligations for Mr. Keough to fulfill, the Court should modify the conditions of Mr. Keough's supervised release to render him non-reporting and remove the drug testing requirement, thereby allowing him to relocate to El Salvador with his family.

Dated: July 1, 2025

FOX ROTHSCHILD LLP

/s/ Patrick J. Egan

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Attorneys for Defendant

Gregory Scott Keough

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

CASE NO. 9:23-CR-80154-DMM-1

UNITED STATES OF AMERICA,

Plaintiff,

v.

GREGORY SCOTT KEOUGH,

Defendant.

DECLARATION OF GREGORY SCOTT KEOUGH

As provided by 28 U.S.C. § 1746, I, Gregory Scott Keough hereby declare the following:

1. I am over eighteen years of age and make this Declaration on the basis of personal knowledge.
2. In November 2023 I plead guilty to two counts of wire fraud, 18 U.S.C. § 1343, and one count of money laundering, 18 U.S.C. 1957(a). I voluntarily reported to prison on or around March 25, 2024.
3. I was released from prison to a halfway house on May 21, 2025. Upon my release from prison, I have been subjected to three drug tests; the first upon my arrival to the halfway house, the second in mid-June 2025, and the third on July 1, 2025. I passed all three drug tests.
4. I have never abused alcohol, nor experimented with any illicit drugs.
5. I am currently under home confinement at a rental property in Wellington, Florida.
6. My wife Ana and our five children currently reside in San Salvador, El Salvador. I personally have lived in El Salvador intermittently for the last ten years as an authorized legal resident.

7. Beginning in 2021, my family had resided in El Salvador full-time. Prior to my plea in November 2023, my family and I had intended to settle in El Salvador permanently.

8. Neither I nor my wife own any real estate in the United States.

9. My daughter previously was a student in the United States but is now studying in Spain.

10. My father-in-law, Antonio Cabrales, passed away unexpectedly in April 2023 following a car accident. Due to this loss in the family, my wife and I are now the primary caregivers to my mother-in-law in El Salvador.

11. My family has struggled emotionally and financially without me in El Salvador. I intend to rely on my family to ease the transition from prison to civilian life.

12. Should I be able to return to El Salvador, I will be able to resume the employment I held there prior to my conviction.

13. I consider myself to have no enduring personal or financial ties to the United States.

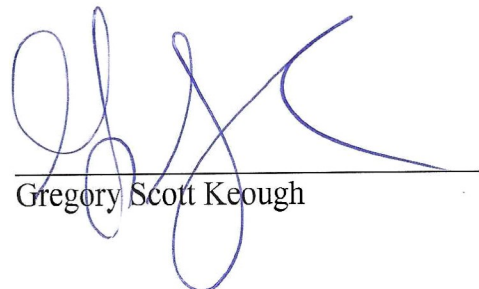
14. I consider El Salvador my home.

15. To my knowledge, I have satisfied all restitution obligations in connection with my conviction.

16. I attest that the foregoing facts are true and correct to the best of my knowledge, information, and belief. I am aware that if any of the foregoing is willfully false I am subject to punishment.

I declare under penalty of perjury that the foregoing is true and correct.

Executed June 30, 2025



Gregory Scott Keough

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

CASE NO. 9:23-CR-80154-DMM-1

UNITED STATES OF AMERICA,

Plaintiff,

v.

GREGORY SCOTT KEOUGH,

Defendant.

DECLARATION OF PATRICK J. EGAN, ESQ.

As provided by 28 U.S.C. § 1746, I, Patrick J. Egan, Esq. hereby declare the following:

1. I am over eighteen years of age and make this Declaration on the basis of personal knowledge.
2. I am counsel for Defendant Gregory Scott Keough and applied for admission *pro hac vice* in the above captioned matter. *See* ECF No. 69. Mr. Keough has authorized me to make this Declaration in support of his Motion to Modify Conditions of Supervised Release.
3. On June 3, 2025, I contacted Scott T. Kirsche, the Supervisory United States Probation Officer assigned to Mr. Keough's case, to seek the Probation Office's position on a modification to Mr. Keough's supervised release to render Mr. Keough non-reporting. In response to my request, Mr. Kirsche stated that "[the U.S. Probation Office] typically do[es] not recommend non-reporting supervision as it becomes impossible to enforce any of the standard and special conditions imposed by the court, **however, it may be appropriate in this case.**"
4. Responding to the same request, Katie Sadlo, the Assistant United States Attorney assigned to Mr. Keough's case, informed me that the government would be opposing Mr. Keough's request for a modification of the conditions of his supervised release.

5. I attest that the foregoing facts are true and correct to the best of my knowledge, information, and belief. I am aware that if any of the foregoing is willfully false I am subject to punishment.

I declare under penalty of perjury that the foregoing is true and correct.

A handwritten signature in black ink, appearing to read "P. J. Egan", written in a cursive style.

Executed July 1, 2025

Patrick J. Egan, Esq.