

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 8:21-cr-370-CHE-JSS

BRIDGITTE KEIM

**UNITED STATES' RESPONSE IN OPPOSITION TO DEFENDANT'S
MOTION FOR EARLY TERMINATION OF PROBATION**

The United States of America, by and through the undersigned Assistant United States Attorney, files this response in opposition to the defendant's *pro se* motion for early termination of probation (Doc. 40).¹ For the reasons stated below, the defendant's motion should be denied.

On January 5, 2021, the defendant entered a guilty plea to a one count Criminal Information charging her with bank fraud, in violation of 18 U.S.C. § 1344. (Doc. 12). On April 8, 2022, the defendant was sentenced by this Court to a term of 24 months' imprisonment to be followed by a three-year term of supervised release. (Doc. 20). In July of 2023, the defendant commenced her three-year term of supervised release. On January 15, 2025, the defendant filed her instant motion, and the Court directed the United States to respond. (Docs. 40 and 41).

¹ The Court sentenced to a three-year term of supervised release, not probation. (Doc. 26)

Undersigned counsel has communicated with the defendant's probation officer, Brynn Dawsey, to obtain his position and discuss the statements and claims made by the defendant in her motion. After consultations with probation officer Dawsey, the United States opposes the defendant's motion for the following reasons:

1. The defendant's motion is somewhat misleading. Keim states that USPO Dawsey was in favor of her filing for early termination. Officer Dawsey did not express any opinion about the defendant filing a motion for early termination. Rather, Dawsey presented the defendant with her options; one of which was to hire counsel to file a motion on her behalf.

2. In response to questions concerning current employment and income, the defendant advised probation that she is currently being paid in cash by her employer. The defendant further advised that she cannot produce recent paystubs to validate employment and income. This creates a legitimate concern that cash payments create a risk of not reporting income for tax purposes.

3. The defendant's motion asserts that she has paid all of her Court fees/fines and that her restitution payments are current. This is true. However, the defendant has only paid \$2,915.59 in restitution and an outstanding balance of \$118,734.97 remains. The defendant still owes approximately 95%

restitution to the victims of her crimes and should pay more restitution prior to granting an early termination of supervised release.

4. Finally, and most troubling, the defendant was instructed by officer Dawsey to file a new financial statement. **To date, the defendant has failed to follow the instruction of her probation officer. Special Condition three requires the defendant to provide the probation officer with access to any requested financial information.** (Doc. 31 at pg. 6).

Without a new financial statement neither probation or the United States can evaluate the defendant's financial condition, whether changed circumstances would allow for raising the mandated monthly restitution payment ordered by the Court, and whether her cash employment income is being reported to the Internal Revenue Service as required by law.

WHEREFORE, the United States respectfully requests that this Court deny the defendant's *pro se* motion for early termination of her term of supervised release.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on January 23, 2025, a true and correct copy of the foregoing document and the notice of electronic filing were sent by United States Mail to the following non-CM/ECF participant(s):

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