UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA	*	
V.	*	**Cr. No. RDB-23-210**
DAVID EPSTEIN	*	
Defendant	*	
For: DAVID EPSTEIN	*	

MOTION TO MODIFY RELEASE CONDITIONS
(CONSENT)

Defendant, DAVID EPSTEIN, by his undersigned counsel, hereby requests this Honorable Court to modify his release conditions to permit him to open personal checking and savings accounts, with monitoring by Pretrial Services, and as grounds states:

1. Mr. Epstein was indicted on June 14, 2023, on charges of wire fraud related to a Paycheck Protection Program loan. He had his initial appearance by agreement on August 3, 2023. He was released on conditions the same day and has been on release without incident for over a year.
2. Epstein pled guilty to count three on October 8, 2024 and is scheduled for sentencing on January 14, 2025.
3. One of the conditions of release was that he could "not open any bank accounts or lines of credit." ECF 10, para. 8(w).
4. On November 13, 2024, Epstein was notified by Capital One Bank that the bank was closing his personal checking and savings accounts. The bank provided no advance notice or grounds for its actions. The Capital One accounts were Epstein's only personal bank accounts.

5. Mr. Epstein, like most people, needs bank accounts to receive his paycheck and then pay his bills. Without any bank accounts, he cannot pay his mortgage, electric or water bills, buy food for his family or pay other normal debts incurred as part of a regular life.
6. He therefore seeks Court approval to open personal checking and savings accounts. He agrees that Pretrial Seervices can access these accounts if they so desire.
7. United States Probation Officer Erin Thumma states that she consents to the granting of this motion
8. Assistant United States Attorney Paul Riley states that he consents to the granting of this motion.

WHEREFORE, DAVID EPSTEIN, hereby requests this Honorable Court to permit him to open personal checking and savings accounts, with monitoring by Pretrial Services.

Respectfully submitted,

_____/s/_____
Richard Bardos, Of Counsel
Schulman, Hershfield & Gilden, P.A.
1 East Pratt Street, 9th Floor
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(410) 332 0850

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 15th of November, 2024, a copy of the foregoing was served electronically by ECF to: Office of the United States Attorney, 36 South Charles Street, Fourth Floor, Baltimore, Maryland 21201 and all defense counsel.

_____/s/_____
Richard Bardos