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 AMEND CONDITIONS OF SUPERVISED RELEASE (CONSENT)

Defendant, David Epstein, though his undersigned counsel, hereby submits this motion to amend his conditions on supervised release and as grounds states:

1. On May 7, 2025, this Court sentenced Mr. Epstein to a period of incarceration of one year and one day, followed by twelve months of home confinement. ECF 45. At that time, the Court permitted the defendant to self-surrender to his sentence on August 7, 2025. *Id*.
2. Subsequently, the Court agreed to extend the self-surrender date to October 16, 2025, when Mr. Epstein surrendered to his designated facility, Otisville, New York.
3. The Bureau of Prison released Epstein to a half way house in April, 2026. He was then placed on supervised release in late May, 2026.
4. While he was incarcerated at Otisville, Mr. Epstein began practicing as an Orthodox Jew, and he continues that practice on release. That practice includes going to synagogue twice a day during the week for

approximately an hour each time, plus going to synagogue on Saturdays for three to four hours, totaling, without travel, about 16 hours a week.

5. Although the Court, in setting his conditions of supervised release at the time of sentencing allowed him out for religious services, ECF 45, p. 4, Probation advises that their policy is to allow only a maximum of 4 hours a week for religious services, which includes travel.

6. In order for his Probation Officer to permit him to attend his religious services as required, Probation advises that an Order from the Court exception Mr. Epstein from the 4 hours limit would be needed.

7. The defendant respectfully requests that this Court issue an Order permitting him to attend his religious services as needed, in excess of Probation's policy, with a schedule to be provided to his Probation Officer each week in advance.

8. Second, at sentencing, the Court permitted the defendant to leave his home for employment., ECF 45, *id*. Probation advises that their policy is to allow only a maximum of 50 hours a week for a defendant to be out of his house for any reason. Mr. Epstein intends to seek full time employment, 40 hours a week. This employment, added to his religious outings, would exceed Probation's 50 hour maximum.

9. The defendant respectfully requests that this Court issue an Order permitting him to obtain employment and be out of his home, in excess of

Probation's policy, with a schedule to be provided to his Probation Officer each week in advance.

10. Finally, as the Court may recall, Mr. Epstein's 16 year old daughter plays softball and has now qualified for a travel team. From June 28 to July 29, 2026, she has tournaments in Colorado, Ohio, North Carolina and Tennessee. The tournaments are 3-4 days. The Crush National Summer Tournament schedule is attached as Exhibits 1 and 2.
11. He would like to be able to take his daughter to these events. His current supervised release conditions prohibit him from leaving Maryland. His daughter cannot drive herself to these games and the defendant's wife is recovering from surgery and cannot travel long distances.
12. As a result, the defendant respectfully requests to be permitted to take his daughter to these tournaments, with a travel schedule provided to Probation in advance.
13. Probation Officer Vicki Adams advised that she consents to the granting of this motion
14. Assistant United States Attorney Ariel Evans also advises that his consents to the granting of this motion.

WHEREFORE, defendant David Epstein respectfully requests that this Court amend his conditions on supervised release as outlined herein.

Respectfully submitted,

_____/s/_____
Richard Bardos, Of Counsel

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 15th of June, 2026, 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.

_____/s/_____
Richard Bardos