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July 2, 2026

VIA ECF

Hon. Gary R. Brown
United States District Court Judge
Eastern District of New York
100 Federal Plaza Central Islip
Central Islip, NY 11722

RE: United States v. Keith Williams, 25 Cr. 20 (GRB)— **Bond Modification Request**

Dear Judge Brown:

I represent Keith Williams in the above-referenced matter. I write to respectfully request a modification of Mr. Williams's bail conditions. Mr. Williams's current conditions of release prohibit him from traveling outside the Eastern and Southern Districts of New York. He respectfully requests that the Court modify those conditions to permit him to attend a family reunion in Charlotte, North Carolina. Specifically, Mr. Williams requests permission to travel to Charlotte, North Carolina, from July 16, 2026, through July 20, 2026.

I have consulted with the Government, and they defer to Pretrial Services. I have also consulted with Mr. Williams's Pretrial Services Officer, who has no objection to this request.

Accordingly, Mr. Williams respectfully requests that the Court modify his conditions of release to permit the requested travel.

Respectfully Submitted,

Christine Delince

Christine Delince, Esq.