

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

UNITED STATES OF AMERICA,

v.

STEPHEN ANDREW BYRNE

No.: 3:20-CR-335

MOTION TO AMEND
CONDITIONS OF RELEASE

Defendant Stephen Andrew Byrne, by and through his undersigned counsel, and with the consent of the Government, moves the Court for an Order amending the conditions of his release to allow Mr. Byrne to travel within the United States on the condition he notify pretrial services before leaving the State. At present, Mr. Byrne’s travel is “restricted to the State of SC without prior permission of the Court through pretrial services.” See Dkt. 27, ¶7(f). Mr. Byrne is presently exploring many different job and business opportunities throughout the country that will require frequent travel to various states. In addition, Mr. Byrne is considering relocation outside of the State and wishes to visit various cities as he evaluates relocation. Finally, Mr. Byrne has family located outside the State that he would like to visit.

Mr. Byrne’s plea agreement with the Government is expressly contingent on his compliance with the terms of his bond and compliance with state and federal law. Mr. Byrne does not present a flight risk and his passport has been turned over to the Government. Accordingly, Defendant Byrne respectfully requests the Court modify the terms of his bond such that Mr. Byrne may travel outside the State upon his provision of notice to pretrial services. Such notice would include his anticipated date of departure, destination, anticipated date of return, and such other information as requested by pretrial services.

WE SO MOVE:

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November 3, 2020
Columbia, South Carolina