

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA
GAINESVILLE DIVISION

UNITED STATES OF AMERICA,

-against-

Docket # 1:15-CR-00023

JONATHAN MARSHALL TAYLOR,

Defendant.

**DEFENDANT'S MOTION TO MODIFY TERMS OF
SUPERVISED RELEASE TO PERMIT TRAVEL**

Defendant, Jonathan Marshall Taylor, by and through undersigned counsel, hereby respectfully submits this motion pursuant to 18 U.S.C. § 3583 and Rule 32.1 of the Federal Rules of Criminal Procedure to modify the terms of his Supervised Release to permit travel, and respectfully states as follows:

1. On September 16, 2016, Defendant was sentenced to 48 months imprisonment followed by 10 years of Supervised Release with standard conditions upon his plea of guilty to 18 U.S.C. §§ 1591(a)(1), 1591(b)(2) and 2.
2. Defendant was released from the custody of the Bureau of Prisons on April 7, 2020 and commenced his term of Supervised Release.
3. Defendant had no violations of Supervised Release while he resided within the Northern District of Florida, and remained fully compliant with the terms of his supervision.
4. On or about June 1, 2022, Defendant moved back to his native New York to pursue employment opportunities, and his supervision was transferred to the Eastern District of New York. He has resided in Brooklyn, New York approximately 4 blocks from the United States Department of Probation office since then, and has remained fully compliant and gainfully employed.

5. This Court granted the Defendant's prior requests to travel to the Dominican Republic with his girlfriend for several purposes, including pursuit of business opportunities and to visit with her family who resides within the Dominican Republic. The Department of Probation did not object to that request. Defendant traveled to the Dominican Republic, completed his business there and returned to New York as required.

6. Defendant respectfully requests permission to travel California for business purposes and to Arizona for business purposes as well. He has provided his proposed itinerary to USPO Joshua Mack, who has no objection but has requested he seek court approval since his travel plans involve travel to multiple Federal Districts.

7. Defendant seeks approval to leave New York City on August 25, 2023, fly to San Francisco for a business meeting with his girlfriend and business partner, then travel to Napa, California for a business meeting, then travel to Los Angeles to meet with one of his attorneys to discuss a business proposal, before driving to San Diego, California for another meeting on September 2, 2023. From there, he planned to drive to the Grand Canyon in Arizona with his girlfriend for a 2-day stay and then fly back to New York City on September 5, 2023.

8. Defendant has no other ties to California other than the business contacts, and no ties to Arizona. All of his familial ties and his employment are in the State of New York.

9. Defendant will honor all terms and conditions should this Court grant this application in checking in with any local law enforcement in any of the cities in which he is staying, or any other condition to ensure his return. If this Court grants this motion, Defendant will provide all travel information, including the itinerary and the names of the people he will be associating with and the places he will be staying and visiting.

10. Probation Officer Joshua Mack, who is currently supervising Defendant in Brooklyn, has been notified of this request and has no objection hereto. Defendant has remained compliant with the terms of his supervision.

11. This motion is made in this Court and not in the Eastern District of New York because there has been no transfer of jurisdiction of this case as of this filing.

WHEREFORE, the defense respectfully requests that this Court grant this motion together with such other and further relief as this Court may deem just, proper, and equitable.

Dated: August 18, 2023

Respectfully Submitted,

/s/ Patrick Michael Megaro, Esq.
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via CM/ECF on August 18, 2023 to:

Francis Todd Williams
Office of the United States Attorney
Frank.Williams@usdoj.gov

/s/ Patrick Michael Megaro, Esq.
Patrick Michael Megaro, Esq.