

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 REMOVE TRAVEL RESTRICTIONS**

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 has previously granted several of the Defendant's prior requests to travel within the United States, and to travel internationally for business purposes. The Department of Probation did not object to any prior requests. Each time, the Defendant has remained fully compliant with any terms and conditions of travel and has remained in touch with Probation Officer Joshua Mack.

6. The Defendant now plans to travel regularly for business purposes as he pursues various opportunities. All of his familial ties are in the State of New York where he now resides. He plans to return each and every time to his home in New York when his business is concluded.

7. The Defendant respectfully requests that this Court modify the terms of his Supervised Release to remove any travel restrictions without court approval.

8. A modification of Supervised Release will permit the Defendant to travel as needed without having to burden this Court with additional motions, and will make arrangements simpler for Probation Officer Mack.

9. The modification will **not** relieve the Defendant of the responsibility for first informing Probation of his intention to travel, obtaining their permission, providing Probation with his itinerary, keeping in contact as necessary, and honoring any conditions his Probation Officer imposes on travel. The Defendant fully intends to continue to do exactly what he has been doing all along.

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: September 14, 2023

Respectfully Submitted,

/s/ Patrick Michael Megaro, Esq.

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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via CM/ECF on September 14, 2023 to:

Francis Todd Williams

Office of the United States Attorney

Frank.Williams@usdoj.gov

/s/ Patrick Michael Megaro, Esq.

Patrick Michael Megaro, Esq.