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October 23, 2020

**BY ECF**

The Honorable Andrew L. Carter, Jr.  
United States District Court Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**JOINT STATUS REPORT**

Re: *United States v. Reginald Fowler, S3 19 Cr. 254 (ALC)*

Dear Judge Carter:

We are counsel to Mr. Reginald Fowler in the above-referenced action, and we submit this letter jointly with the government to request a bail hearing during the week of October 26, 2020. At the October 15, 2020 status conference, we advised the Court that we had informed the government of our intention to request a modification of the defendant's current bail conditions to allow him to fund his defense. The Court instructed the parties to file a joint status report on the bail application today. Unfortunately, the parties have been unable to reach an agreement.

By way of summary, the defense seeks an adjustment of the May 8, 2019 letter (the "Letter")(attached), endorsed by the Court, which served as the basis of Mr. Fowler's release on bond with conditions. Among other elements, the Letter includes, as the fifth bail condition, that "[n]o new lines of credit without [Pretrial Services] approval" shall be issued to the defendant. The Letter also references the five properties that the government required the defendant to post as security for the \$5 million personal recognizance bond. The defense requests modification of both of these items.

Specifically, the defense respectfully requests that the language of the fifth bail condition of the Letter be changed to bar the defendant only from seeking lines of credit without pretrial services approval against property obtained after February 2018 (the beginning of the alleged conspiracy). The defense also asks that the below five houses be removed as additional security for the bond:

- 3965 Bayamon Street, Las Vegas, Nevada
- 8337 Brittany Harbor Drive, Las Vegas, Nevada
- 4670 Slippery Rock Drive, Fort Worth Texas
- 4417 Chaparral Creek Drive, Fort Worth, Texas

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- 8821 Friendswood Drive, Fort Worth, Texas

The government opposes this application. The defense and government have conferred about scheduling a short hearing to resolve these issues, and the parties are generally available Wednesday, October 28 and Friday, October 30 of next week.

Respectfully submitted,

/s/ James G. McGovern

James G. McGovern

cc: All counsel of record (via ECF)