

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

United States of America	:	
	:	
v.	:	Case No. 1:23-cr-00267 (APM)
	:	
Adam Obest,	:	
<i>Defendant.</i>	:	

**DEFENDANT ADAM OBEST’S UNOPPOSED
MOTION TO MODIFY A CONDITION OF RELEASE**

COMES NOW the Defendant, Adam Obest, through counsel, and respectfully moves this Court to modify a condition of his release to permit Mr. Obest to drive his children home from school following school sporting events on weekdays. In support of this Motion, Mr. Obest states the following:

Background and Argument

The Government charged Mr. Obest, by Criminal Complaint, based on allegations related January 6, 2021. The Criminal Complaint alleges violations of Civil Disorder (18 U.S.C. § 231(a)(3)), Assaulting, Resisting, or Impeding Certain Officers Using a Dangerous Weapon (18 U.S.C. §§ 111(a)(1) and (b)); Entering and Remaining in a Restricted Building or Grounds, Disorderly and Disruptive Conduct in a Restricted Building or Grounds, and Engaging in Physical Violence in a Restricted Building or Grounds (18 U.S.C. §§ 1752(a)(1), (2), and (4) and (b)(1)(A)); and Acts of Physical Violence in the Capitol Grounds or Buildings (40 U.S.C. § 5104(e)(2)(F)). (ECF No. 1.)

Following his initial appearance, the Court ordered Conditions of Release. (ECF No. 7.) Relevant to this Request, paragraph 7(p)(i) imposes a curfew on Mr. Obest, restricting him to his residence from 10:00p.m. to 6:00a.m. every day.

Mr. Obest has a minor child who participates in school sporting events, primarily on

weekdays. As a participant, she travels back from these games to her school, often arriving around 10:00 p.m. back at her school. Mr. Obest is his child's primary means of transportation, since his spouse does not drive. Mr. Obest would like to be able to pick up his child from the school after these sporting events, which would require that he be away from his residence until potentially as late as 11:00 p.m.

Mr. Obest respectfully requests that the Court modify the Conditions of this Release to move his curfew back to 11:00 p.m. on weekdays, which will permit him to pick up his minor child after school sporting events. All other conditions of his release would remain the same.

Granting this modification would not jeopardize Mr. Obest's release. The Government does not object to this request.

Conclusion

For the foregoing reasons, Defendant respectfully requests that this Court grant this unopposed motion to modify his release conditions to require him to be at his residence from 11:00 p.m. to 5:00 a.m. on weekdays, with his curfew remaining at 10:00p.m. on weekends.

Date: September 20, 2023

Respectfully submitted,

Adam Obest
By Counsel

/s/ Samuel C. Moore
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CERTIFICATE OF SERVICE

I hereby certify that a copy of Defendant's Motion to Modify Conditions of Release was served upon counsel of record through ECF on the date of filing.

/s/ Samuel C. Moore _____

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