

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 TEMPORARILY MODIFY A CONDITION OF RELEASE**

COMES NOW the Defendant, Adam Obest, through counsel, and respectfully moves this Court to temporarily modify a condition of his release to permit Mr. Obest and his family to travel to Lancaster, Pennsylvania between January 15, 2024, and January 16, 2024. 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(f) permits the Defendant to request permission directly from pretrial services to travel outside of the District of Maryland. Paragraph 7(p)(i) imposes a

curfew on Mr. Obest, restricting him to his residence from 10:00pm to 6:00am every day.

Upon Defendant's Motion, the Court subsequently modified the start of the curfew to 11:00pm each day. (ECF No. 21.)

Mr. Obest and his wife are trying to plan a very brief family trip to Lancaster, Pennsylvania between January 15 and January 16, 2024. While pretrial services can grant permission for Mr. Obest to travel to Williamsburg, he would still be required to return to his home in Maryland prior to the curfew—which makes the vacation logistically and practically untenable.

Mr. Obest respectfully requests that the Court temporarily modify the Conditions of this Release to permit him to travel to Lancaster, Pennsylvania with his family during these dates and temporarily move his curfew to the DoubleTree Resort, 2400 Willow Street Pike, Lancaster, Pennsylvania 17602 between 11:00pm and 6:00am for the evening of January 15, 2024. All other conditions of his release would remain the same.

Granting this temporary 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 permit him to travel to Lancaster, Pennsylvania and temporarily move his curfew between January 15, 2024, and January 16, 2024.

Date: December 28, 2023

Respectfully submitted,

Adam Obest
By Counsel

/s/ Samuel C. Moore

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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