

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

United States of America	:	
	:	
v.	:	Case No. 1:23-MJ-00125 (MAU)
	:	
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 Williamsburg, Virginia between July 14, 2023, and July 20, 2023. 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.

In January of 2023, Mr. Obest and his family planned and booked travel to Williamsburg, Virginia between July 14, 2023, and July 20, 2023. *See* Exhibit A, e-mail confirmation. They planned this vacation for the family well before the Criminal Complaint and arrest in this matter. 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 Williamsburg, Virginia with his family for this pre-planned vacation. Mr. Obest further requests that that his curfew be temporarily moved to his rental room at 200 English Garden Way, Williamsburg, VA 23188, between 10:00pm and 6:00am each night beginning on the evening of July 14, 2023, and ending on the morning of July 20, 2023. 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 Williamsburg, Virginia, and temporarily move his curfew between July 14, 2023, and July 20, 2023.

Date: July 5, 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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