

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES

v.

DANIEL P. ADAMS

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Case No.: 1:21-cr-0084-PLF-2

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MOTION TO MODIFY CONDITIONS OF RELEASE

COMES NOW the Defendant by and through his attorney, Gary E. Proctor, and respectfully requests that this Honorable Court grant the modification requested herein, and in support of his motion states as follows:

1. On April 9, 2021 this Court released Mr. Adams. As part of those conditions of release Mr. Adams surrendered his passport.
2. On September 23, 2021 this Court amended Mr. Adams' conditions of release so that he may travel further than 150 miles for work, provided that Pretrial Services approves in advance and he checks in with them twice weekly. ECF 44.
3. In three years, Mr. Adams has not put a foot wrong. He has, at all times, been complaint, and gainfully employed. Neither has he taken a vacation in three years. He now requests permission to go on a four (4) day cruise with his wife and daughter. He will be leaving to and from the port of Galveston, Texas on June 20, 2024, returning at 8 AM on June 24, 2024. The cruise ship makes only one stop, in Cozumel, Mexico, on June 22nd.
4. Sentencing in this matter has been delayed through no fault of Mr. Adams. The idea that he would somehow walk away from his wife and child in Cozumel is fanciful. Moreover, while the Defendant is no authority on this, it appears from several websites that no passport is required to walk into Mexico from the United

States. Thus: if Mr. Adams was planning to flee to Mexico, without plans to return – he would already have done it. The fact that he is asking this Court more than two (2) months in advance of said travel shows his sincerity to abide by all restrictions set.

5. Mr. Adams is willing to take whatever steps the Court requires to approve this trip. He is happy to check in with Pretrial or his counsel daily. His supervising Agent in the Southern District of Texas notes Defendant's compliance, and states that he defers to the Court.
6. The undersigned has also spoken to Assistant United States Attorney Sean McCauley, who has authorized him to state that the Government opposes this request.

WHEREFORE, the Defendant prays this Honorable Court sign the attached order and amend Mr. Adams' conditions of pretrial release.

Respectfully submitted,

/s/

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Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this day, April 4, 2024 a copy of the attached was served on all parties via ECF.

_____/s/_____
Gary E. Proctor