

**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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UNOPPOSED 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. This Court has twice denied motions for Defendant to travel to Mexico. Accordingly, Defendant has adjusted his sights and now seeks permission to travel domestically to Fort Lauderdale from June 26 - 30, 2024.
4. His supervising Agent in the Southern District of Texas notes Defendant’s compliance, and states that he defers to the Court. Da’Shanta Valentine-Lewis of Pretrial Services in the District likewise defers to the Court.
5. The undersigned has also spoken to Assistant United States Attorney Sean McCauley, who has authorized him to state that the Government does not oppose

this request. The Government does request that Mr. Adams check in with his Pretrial offer twice daily while he is traveling. Defendant has no objection to this and the Proposed Order attached mandates it.

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, May 1, 2024 a copy of the attached was served on all parties via ECF.

/s/

Gary E. Proctor