

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

| | | |
|---------------------------------|---|------------------------------------|
| |) | |
| UNITED STATES OF AMERICA |) | Case No. 21-CR-100(CRC) |
| |) | |
| v. |) | Judge Christopher R. Cooper |
| |) | |
| JACOB LEWIS |) | |
| |) | |
| |) | |

UNOPPOSED MOTION TO MODIFY CONDITIONS/ALLOW TRAVEL

The Defendant, Jacob Lewis, through undersigned counsel, respectfully moves the Court to modify the conditions of his bond so that he can travel to Cancun, Mexico to attend a wedding. His current conditions of pre-trial release do not allow his to travel outside the United States. Mr. Lewis would travel from December 19th through December 22nd and would provide his Probation Officer with details regarding his flights and lodging in Mexico.

1. Mr. Lewis is before the Court charged in a criminal information with four misdemeanor offenses: Entering and Remaining in a Restricted Building, in violation of Title 18, United States Code, § 1752(a)(1); Disorderly and Disruptive Conduct in a Restricted Building, in violation of Title 18, United States Code, § 1752(a)(2); Violent Entry and Disorderly Conduct in a Capitol Building, in violation of Title 40, United States Code, § 5104(e)(2)(D); and Parading, Demonstrating, or Picketing in a Capitol Building, in violation of Title 40, United States Code, § 5104(e)(2)(G).

2. The defendant and the United States have been in plea negotiations and the undersigned is confident the case will be resolved without a trial.

3. The undersigned consulted with AUSA Susan Lehr and she does not object to Mr. Lewis’ travel to Mexico to attend the wedding. Mr. Lewis’ Probation Officer, Ms. DaShanta Valentine-Lewis was also notified of the request.

4. There have been not facts provided in discovery that indicate that Mr. Lewis was involved in any violence towards police or destroyed government property on January 6, 2020. He is a small business owner and does not present a risk of flight or a danger to the community.

WHEREFORE, the Defendant respectfully requests that his conditions of release be modified so that he be allowed to attend his friend's wedding in Cancun, Mexico from December 19 through December 22, 2021. This modification is conditioned on Mr. Lewis providing his Probation Officer with his travel plans one-week prior to his departure.

Respectfully submitted,

| | | |
|-----|--|---|
| By: | <u>/s/ Dan Eckhart</u> DAN ECKHART, Esq. FL Bar No. 488674 200 E. Robinson St., Ste. 1150 Orlando, FL. 32801 dan@daneckhartlaw.com (407) 276-0500 | <u>/s/ David Bigney</u> DAVID BIGNEY, Esq. FL Bar No: 132454 215 East Livingston Street Orlando, Florida, 32801 dbigney@bigneylaw.com (407) 425-6068 |
|-----|--|---|

CERTIFICATE OF SERVICE

I hereby certify that on November 29, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all parties listed on the Electronic Case Filing (ECF) System.

| | | |
|-----|---------------------------------------|---|
| By: | <u>/s/ Dan Eckhart</u> DAN ECKHART | <u>/s/ David Bigney</u> DAVID BIGNEY |
|-----|---------------------------------------|---|

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

JACOB LEWIS

)
)
)
)
)
)
)
)
)
)

Case No. 21-CR-100(CRC)

ORDER

Upon consideration of the Defendant’s UNOPPOSED MOTION TO MODIFY
CONDITIONS/ALLOW TRAVEL, it is hereby **ORDERED**

that the Motion be **GRANTED** and that Mr. Lewis be permitted to travel to Cancun,
Mexico from December 19th through December 22nd, 2021 to attend a wedding. This Order is
conditioned on Mr. Lewis providing his Probation Officer with a copy of his travel itinerary at
least one week prior to his departure.

SO ORDERED

DATE

HONORABLE CHRISTOPHER R. COOPER
UNITED STATES DISTRICT JUDGE