

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO. 21-177 (CRC)
)
)
 DANIEL D. EGTVEDT.)

MOTION FOR MODIFICATION OF PRETRIAL RELEASE CONDITIONS

COMES NOW Kira Anne West, counsel for Mr. Daniel D. Egtvedt in the above captioned case, and asks this Honorable Court to order a modification in pretrial release conditions and in support states the following:

As this Court knows, Mr. Egtvedt is charged with numerous counts, both misdemeanors and felonies, in the January 6, 2021, riot at the Capitol. Mr. Egtvedt has been compliant with his pretrial release conditions. These conditions are stringent, spelled out by the pretrial officer, and constantly being reviewed and confirmed by undersigned counsel. Mr. Jeremy Beck, the pretrial officer in Maryland who supervises Mr. Egtvedt asked that a phone line be put into the condo so that Mr. Egtvedt could still be monitored electronically. This has been done by the Third Party Custodian.

Specifically, Mr. Egtvedt requests that he be allowed to live in the condominium that is owned by the family and which Mr. Rick Egtvedt, the third party custodian, has control over for the family. The condominium is approximately a football field away from Rick Egtvedt's home where the defendant Daniel Egtvedt is currently residing. The defendant has resided in the home with his brother and mother, who is suffering from dementia, for approximately seven months since his release from jail by this Court.

Undersigned counsel personally visited the home in late August, 2021 for a period of three consecutive days. Upon observation, the conditions at the home can only be described as tense. This is understandable considering the burdens that Mr. Rick Egtvedt has been handling since his mother's declining health and the defendant's arrest for his alleged actions of January 6, 2021. Thereafter, undersigned counsel spoke with defendant's mental health professional, Kelly Rock, about Mr. Egtvedt moving to the condo. She wholeheartedly supports this plan.

As of today, November 2nd, 2021, Pretrial Services Officer John Copes states that he defers to the Court on this matter. The United States Attorney's Office requested more information more than a week ago and undersigned counsel gave them that information. They oppose this motion.

Mr. Egtvedt respectfully requests that this Court order pretrial services to temporarily allow him to stay at the family condo on a temporary basis.

Respectfully submitted,

KIRA ANNE WEST

By: _____
 /s/
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CERTIFICATE OF SERVICE

I hereby certify on the 2nd day of November, 2021 a copy of same was delivered to the parties of record, by email, pursuant to the Covid standing order and the rules of the Clerk of Court.

/s/

Kira Anne West