

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

JON THOMAS MOTT,

Defendant.

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Case No. 1:21-CR-00464 (RCL)

**DEFENDANT'S MOTION TO MODIFY BOND CONDITIONS TO PERMIT
SUBSISTENCE HUNTING**

The Defendant, by and through his attorney, respectfully submits his *Motion to Modify Bond Conditions to Permit Subsistence Hunting* and in support thereof states as follows:

1. On July 13, 2021, Defendant was charged by way of information with (Count One) Entering and Remaining in a Restricted Building or Grounds in violation of Title 18 U.S.C. § 1752(a)(1); (Count Two) Disorderly and Disruptive Conduct in a Restricted Building or Grounds in violation of Title 18 U.S.C. § 1752(a)(2); (Count Three) Disorderly Conduct in a Capitol Building in violation of Title 40 U.S.C. § 5104(e)(2)(D); and (Count Four) Parading Demonstrating, or Picketing in a Capitol Building in violation of Title 40 U.S.C. § 5104(e)(G). ECF 14.

2. The Defendant has been out on bond since his initial arrest on May 13, 2021. Defendant remains compliant with the conditions of his release.

3. One such condition is that Defendant is not to possess any firearms or any dangerous weapons (*See* [12](#) Order Setting Conditions of Release).

4. For the majority of his life, Defendant has participated in the Conservation efforts of wildlife management by engaging in the practice of subsistence hunting.

5. This practice also contributes toward supplementing the monies spent by the Defendant toward groceries for an average annual estimate of \$5,000.00 in savings.

6. Defendant and Counsel for the same have discussed the proposed motion modifying bond conditions to permit Defendant to engage in subsistence hunting with Pre Trial Release and Pre Trial Release has no objection other than requesting that it be clarified in the modified order that Defendant is not to have any firearms or ammunition at his residence or place of employment.

7. Defendant lawfully owns several firearms that he has used priorly for the purposes of subsistence hunting which are, in compliance with his bond conditions, NOT in his possession at this time.

8. Defendant has never had any firearm related charges.

WHEREFORE Defendant respectfully prays this Court grant defendant's *Motion* as prayed; order that Defendant's bond conditions are modified to permit Defendant to use his lawfully owned firearms to engage in subsistence hunting; order that Defendant is not permitted to store or keep any firearms or ammunition at his residence or place of employment; and for such other and further relief as this Court shall deem just and proper on the premise.

Respectfully submitted,



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Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of September 2022, I filed the foregoing Motion to Modify Bond Conditions, and a proposed Order by the Court's CM/ECF system. All case registered parties will be served by CM/ECF.

A handwritten signature in black ink, appearing to read "Gall", is positioned above a horizontal line.

Joseph W. Allen