

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF COLUMBIA

UNITED STATES

*

*

v.

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

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DANIEL P. ADAMS

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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. Among Mr. Adams’ conditions of release are that he may only travel within 150 miles of his home. Mr. Adams was previously allowed to travel by this Court, which he complied with, without incident.

2. Mr. Adams has accepted a new position of temporary employment. He has been employed by a company in Artesia, New Mexico to work as a welder for a period of thirty (30) days.

3. Counsel has spoken to Pretrial, who indicated that they do not oppose the request, and that Mr. Adams’ has been fully compliant in the almost six (6) months since his release.

Pretrial has asked for paperwork documenting Mr. Adams’ employment, which will be furnished prior to any travel. Counsel has also spoken with Assistant United States Attorney Troy Edwards

who has authorized us to state that the Government has no objection, so long as Mr. Adams provides a detailed itinerary to Pretrial Services ahead of time, documenting daily activities and locations, gets Pretrial's approval prior to travel, and checks in with Pretrial Services at least twice weekly. Accordingly, this Motion is unopposed.

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, September 23, 2021, a copy of the attached was served on all parties via ECF.

/s/

Gary E. Proctor