

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-CR-116 (DLF)
	:	
WILLIAM McCALL CALHOUN,	:	
	:	
Defendant.	:	
_____	:	

CONDITIONAL NON-OPPOSITION TO DEFENDANT'S  
SECOND MOTION TO MODIFY CONDITIONS OF  
PRETRIAL RELEASE

The United States, by and through the assigned Assistant United States Attorney, conditionally non-opposes the Defendant's Second Motion to Modify his conditions of Pre-trial release filed at ECF document 53. The non-opposition is conditioned on the installation and/or continued monitoring of the Defendant by means of a GPS cuff, and an additional requirement that the Defendant document and receive prior approval from pre-trial supervision for the requested travel and lodging only for the purposes of appearing for trial proceedings resulting from his continued legal employment.

Respectfully submitted,

CHANNING D. PHILLIPS  
ACTING UNITED STATES ATTORNEY

/s/ Adam Alexander  
ADAM ALEXANDER  
Assistant United States Attorney  
AK Bar No. 1011057  
U.S. Attorney's Office for the District of Columbia  
555 4th Street, N.W.  
Washington, D.C. 20530

**CERTIFICATE OF SERVICE**

I hereby certify that on August 20, 2021, I sent a copy of the foregoing via the Court's electronic filing system to Jessica Sherman-Stoltz, Esq., counsel for the defendant.

/s/ Adam Alexander  
ADAM ALEXANDER  
Assistant United States Attorney