

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

UNITED STATES

v.

DANIEL P. ADAMS

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

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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. As part of those conditions of release Mr. Adams surrendered his passport.
2. On September 23, 2021 this Court amended Mr. Adams’ conditions of release so that he may travel further than 150 miles for work, provided that Pretrial Services approves in advance and he checks in with them twice weekly. ECF 44.
3. Mr. Adams is currently an outside salesman and gets paid on commission by DSG Industrial in Baytown, Texas. Exhibit A. They have invited Mr. Adams to come on a cruise with them, leaving Galveston, TX on April 8, 2023, returning to the same port on April 13, 2023. The cruise will make two (2) day stops in Costa Maya, Mexico and Cozumel, Mexico but he will sleep on the Royal Caribbean ship each night. Mr. Adams does not require the return of his passport to make this trip. Also attending will be customers of DSG. The company is paying the costs of this business development trip.
4. Mr. Adams is willing to take whatever steps the Court requires to approve this trip. He is happy to check in with Pretrial or his counsel daily. His daughter is

not coming with him on the trip, as it is a working trip. As such, the likelihood that he absconds and leaves his minor child behind is infinitesimal.¹

5. Counsel has spoken with United States Pretrial Officer Da'Shanta D. Valentine-Lewis who has indicated that Pretrial will defer to the Court.
6. The undersigned has also spoken to Assistant United States Attorney Christopher Amore, who has authorized him to state that the Government opposes this request.

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, March 14, 2023 a copy of the attached was served on all parties via ECF.

/s/

Gary E. Proctor

¹ Arguably, ECF 44 would already permit the Defendant to make employment related trip. But Mr. Adams, who has for almost two (2) years fully complied with release conditions, seeks to be transparent with the Court. This, alone, should provide the Court with considerable comfort.