

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

UNITED STATES OF AMERICA,	:	
	:	
v.	:	Case No. 21-cr-00407-DLF-02
	:	
DANIEL JOHNSON,	:	
Defendant.	:	

MOTION FOR MODIFICATION OF CONDITIONS OF RELEASE

COMES NOW, Defendant Daniel Johnson, by and through his counsel Allen H. Orenberg and, and hereby respectfully requests the entry of an Order modifying his conditions of release. Mr. Daniel Johnson is asking the Court to permit him to attend the wedding of his sister on June 8, 2024, as well as the rehearsal and dinner on June 7, 2024. As grounds, the following is stated:

1. A U.S. Probation Office Petition (ECF No. 86 – sealed) was filed on February 9, 2024. Consequently, Daniel Johnson was arrested, in Cedar Rapids, Iowa, on February 23, 2024. A revocation hearing is scheduled for June 12 2024 at 11:00 a.m. (VTC)

2. On March 21, 2024, this Court conducted a status conference and issued an Order Setting Conditions of Release. (ECF No. 89) The Court placed Daniel Johnson into the custody of his mother, Lisa Johnson – in St. Ansgar, Iowa, with home detention and GPS monitoring. It is counsel’s understanding that he is presently in compliance with this conditions of release – other than allegations

which generated the June 12th revocation hearing.

3. On June 8, 2024, Jennifer Shannon (Daniel Johnson's sister) is being married in Nora Springs, Iowa. Also, there is a rehearsal & dinner on the evening of June 7, 2024. Mr. Johnson is a "Groomsman" and an integral member of the wedding party. Counsel has provided to both AUSA Jake Struebing and USPO Barbara Lekush (NDIA) copies of the wedding invitation and the card listing the wedding day events. (For the wedding party, starting at 11:45 a.m. through 11:00 p.m.)¹

Mr. Johnson and counsel have been informed by USPO Lukesh that, absent a Court Order, she is permitting him only a 3 hour "window" to, in effect, partially attend the wedding of his sister on June 8th. He has not been given permission by USPO Lukesh to attend the rehearsal & dinner on the evening of June 7th (5:00 - 7:00 p.m)

4. Both USPO Monica Glover and AUSA Jake Struebing inform counsel they object to any modification to the current conditions of release, other than the "3 hour window" on June 8th USPO Lukesh has already authorized.

5. Daniel Johnson is very close to his sister, Jennifer. Furthermore, it will be disappointing him and to all of his family if he is not able to fully attend the June 7-8th wedding events. He is asking this Court for permission to attend all of the aforementioned events on June 7-8, 2024. He assures the Court that he will

¹ If requested, copies of both documents will be provided to the Court.

abide by all conditions of his release including the “no alcohol” restriction.

WHEREFORE, for the foregoing reasons and such other reasons which may appear just and proper, Daniel Johnson respectfully requests the entry of an Order to permit him to attend the wedding of his sister on June 8, 2024, as well as the rehearsal and dinner on June 7, 2024.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of May, 2024, a copy of the foregoing Motion for Modification of Conditions of Release, and a proposed Order, was delivered to case registered parties by the CM/ECF court system, and also e-mailed to USPO Barbara Lukesh (NDIA) and to USPO Monica Glover.

Allen H. Orenberg