

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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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, he was ordered to “not possess a firearm, destructive device, or other weapon.” ECF at 2.
2. From the time of his release to the present, Mr. Adams has remained compliant with all terms of his pre-trial release.
3. For the majority of his life, Defendant has participated in wildlife management by engaging in the practice of subsistence hunting.
4. The practice of subsistence hunting allows the Defendant and his family to save a considerable amount on groceries.
5. Prior to this case, the Defendant had traveled for four years to San Augustine, Texas for the purpose of subsistence hunting. The Defendant has utilized land that is a “hunting lease,” which is leased by his friends Neal and Shirley Hood. In the past, the Defendant has abided by all of the rules and regulations of the hunting lease and of the state of Texas.

6. The Defendant now seeks permission from the Court to go bow hunting in San Augustine, Texas for the purpose of replenishing his family's meat supply. San Augustine, Texas is approximately an hour and a half away from Defendant's home.
7. In compliance with his bond conditions, Mr. Adams' bow and arrows are currently locked away at the hunting cabin leased by Neal and Shirley Hood in San Augustine, Texas and are not in his possession at this time. The bow and arrows would remain locked away at that cabin except for when being used by the Defendant while hunting in San Augustine.
8. The Defendant would report any and all trips to San Augustine, Texas for the purposes of hunting to his Pretrial Officer.
9. Counsel has spoken with United States Pretrial Officers Andrew Delpratt and Da'Shanta D. Valentine-Lewis who have indicated that they will defer to the Court because of the nature of the request.
10. Judge Royce C. Lamberth recently signed an order allowing another Defendant facing charges arising out of the events of January 6, 2021 to engage in the practice of subsistence hunting with lawfully owned *firearms*. *See United States v. Jon Thomas Mott*, Crim. No. 21-cr-464, ECF 42 (D. D.C. Sept. 26, 2022).

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, October 24, 2022 a copy of the attached was served on all parties via ECF.

/s/

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Gary E. Proctor