

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES,)	
)	
v.)	Case No. 1:21-CR-117 (TFH)
)	
RYAN NICHOLS,)	
)	
Defendant.)	

**DEFENDANT’S MOTION TO AMEND ORDER SETTING CONDITIONS OF
PRETRIAL RELEASE**

TO THE HONORABLE COURT: Comes now Defendant RYAN NICHOLS, by undersigned counsel, and respectfully submits this Motion to Amend the Court’s Order Setting the Conditions of Pretrial Release (ECF No. 180).

Mr. Nichols hereby requests that the Court amend the Order to include (1) permission for Ms. Nichols, Mr. Nichols’ third party custodian, to visit the website www.camptasia.com on Mr. Nichols’ computer so that the Camptasia software that the Court approved on the record at the hearing on November 22, 2022, can be downloaded onto Mr. Nichols’ computer for his use to prepare for trial; and (2) permission to travel to the local Department of Motor Vehicles (DMV) office on December 6, 2022, so that Mr. Nichols can renew his drivers license so that he can have valid government issued photo identification to travel to his Court appearances. In support, Mr. Nichols states as follows:

Permission to visit www.camptasia.com

1. At a hearing on November 22, 2022, the Court granted Mr. Nichols’ motion for pretrial release so that he can prepare for trial.
2. At the hearing, the Court approved the use of a video editing software called Camptasia, so that Mr. Nichols can prepare presentations for his attorney and for trial.

3. The Court also approved remote video conferencing software, such as Zoom, so that Mr. Nichols could communicate with his attorneys.
4. Mr. Nichols learned that the software must be downloaded from the websites www.camptasia.com and www.zoom.com, but these two websites were not on the list of approved websites on the Court's order.
5. Mr. Nichols' attorney spoke with pretrial services regarding the matter and requested permission for Ms. Nichols to visit the websites to download the software to Mr. Nichols's computer.
6. Pretrial services allowed Ms. Nichols to visit zoom.com to download software for video calls, but would not grant permission to visit www.camptasia.com without a Court order allowing the same.
7. Counsel for Mr. Nichols contacted the Government and asked if they would oppose a motion to amend the order to include permission to visit www.camptasia.com, and they confirmed that they would not.

Permission to visit the DMV to obtain a valid form of government issued photo identification

8. Mr. Nichols' drivers' license expired in December of 2021 while he was detained.
9. Now, Mr. Nichols has no other valid form of government issued photo identification.
10. When Mr. Nichols was released, he was issued a temporary form of photo identification by the jail to present to TSA, which has since expired.
11. TSA informed him that he cannot travel to his Court dates without a valid government issued photo identification.
12. As soon as Mr. and Ms. Nichols returned to Texas upon Mr. Nichols' release, Ms. Nichols contacted the DMV to inquire if a home visit to renew his license was possible.

13. The DMV responded on December 5, 2022, that a home visit is impossible.
14. The DMV further informed Mr. Nichols that if Mr. Nichols can come to the DMV by December 6, 2022, he can renew his license by simply filling out a form and posing for a photo, but if he does not come by December 6, 2022, he will need to reapply for a license, including a driving test.
15. Accordingly, Mr. Nichols hereby requests permission to visit the DMV on December 6, 2022, for the sole purpose of renewing his drivers' license.

WHEREFORE, for the aforementioned reasons, Mr. Nichols requests that this Honorable Court grant permission for Ms. Nichols to visit www.camptasia.com on Mr. Nichols' computer for the purpose of downloading Camptasia software, and permission for Ms. Nichols to drive Mr. Nichols to the DMV on December 6, 2022, for the sole purpose of renewing his drivers' license.

Dated December 5, 2022

Respectfully submitted,

/s/ Jonathan Gross

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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify on the 5 day of December 2022, a copy of the foregoing was served upon all parties as forwarded through the Electronic Case Filing (ECF) System.

/s/ Jonathan Gross
Jonathan Gross