

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

UNITED STATES OF AMERICA

v.

**WILLIAM POPE, and
MICHAEL POPE,**

Defendants.

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Case No. 21-cr-128 (RC)

**GOVERNMENT’S RESPONSE TO DEFENDANT’S MOTION TO MODIFY
CONDITIONS OF RELEASE**

The Government does not take a position on the defendant’s motion and defers to the Court. The Government would note that the defendant already has access to all of the relevant January 6, 2021, footage that he now seeks to view in Washington, D.C., as do all other January 6th defendants and their counsel pursuant to the protective order; and that, as the defendant is aware, he could access this discovery from his supervisory counsel’s office in Kansas. It is the Government’s understanding that the defendant will also be subject to similar restrictions as are imposed by the protective order during his viewing of the video in Washington, D.C. The Government would oppose altering the defendant’s conditions of release for locations other than Washington, D.C., or for periods of time outside of the specific period of time that he will be viewing the videos at the U.S. Capitol.

Respectfully submitted,

MATTHEW GRAVES
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/s/ Kelly E. Moran

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