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

UNITED STATES OF AMERICA	:
	:
V.	:
	:
KENNETH JOSEPH OWEN THOMAS,	:
	:
Defendant	:
	:

Criminal Case No.

1:21-cr-00552 (CRC)

### MOTION OF KENNETH JOSEPH OWEN THOMAS TO MODIFY CONDITIONS OF RELEASE FROM DETENTION FOR PURPOSES OF TRAVELING OUT OF STATE

Defendant KENNETH JOSEPH OWEN THOMAS ("Thomas"), through the undersigned counsel, John L. Pierce, Esq. and Roger I. Roots, Esq., hereby moves the Court to authorize a temporary variation in the terms and conditions of the Defendant's Release from Detention on bail.

The Defendant was released on bail prior to trial. Defendant stood trial before a jury on May 15, 2023 to May 22, 2023, and was convicted of some Counts. However, the Defendant has not yet appeared for sentencing. Defendant has complied with all pretrial and posttrial conditions.

As a result, Defendant Thomas is still on release from detention under the prior terms issued prior to trial. See ECF Dkt. # 12 on June 3, 2021, and corresponding Minute Order. The standard conditions for release were modified on September 24, 2021, by Minute Order in response to motion at ECF Dkt. # 23 for work purposes.

Now, Defendant Thomas has been invited to give a sermon, speak, and lead organized prayers at a conference July 7 to July 9, 2023, in Rogersville, Missouri. This conference is called

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network and seek to raise funds to pay his legal expenses and legal bills, to participate in prayer as a lay minister, and to speak.

Thomas requests modification to allow him to leave his home jurisdiction for some or all of the July 7 to July 9 conference. He asks for leave to travel from July 6 to July 11 to be pragmatically realistic about travel arrangements in case there are limitations on available logistics for travel.

Thomas is a Christian minister, and he has been invited to speak, preach, and provide prayers and invocations at the educational event.

Jan6 Detainees Presents Our Second Annual

# **Truth and Light Freedom Festival**

An amazing weekend of love and support for our J6 community!!! Bring your RV, tent, lawn chairs and the whole family for this annual gathering of the J6 community!!!

## July 7-9 in Rogersville Missouri Fireworks Display on Saturday, July 8th Speakers: Hosted By:

Speakers:

Some of the J6 Detainees Micki Witthoeft 4Ashli.com David Clements-Professor's Record David Sumerall-Stop Hate.com Mark and Jalise Middleton -A.P.R.

> Tim Rivers-A.G.C. Tommy Tatum Captian Gabriel George Tanios Nicole Reffitt Kelly Wilde

### **Ticket Sales!!**

https://www.zeffy.com/en-US/ticketing/eaa5b48f-3674-4a05-9472-24b7f0ed



Hosts: Kevin and Mary Caldwell A.P.R. Sponsors: Juniper Valley Event Center -StopHate.com American Gulag Chronicles -Godfather's Pizza Supporters: J6 Patriot News - Patriot Mail Project - The Truth about J6.org Tommy Tatum News - Freedom Express Media - Patriots at Large



Additionally, Thomas will endeavor to use the trip to help him fundraise and help pay for

his expensive legal costs thus far as well as his expensive appeals ahead. Due to this

prosecution, Thomas and his family have suffered extreme financial hardship.

Because of the short trip, counsel does not believe it is necessary to transfer supervision

of the probation office during that short time.

Dated: July 1, 2023

### **RESPECTFULLY SUBMITTED KENNETH JOSEPH OWEN THOMAS,**

By Counsel

/s/\_\_\_\_\_\_ Roger Root, Esq. John Pierce Law Firm 21550 Oxnard Street 3<sup>rd</sup> Floor, PMB #172 Woodland Hills, CA 91367 Tel: (213) 400-0725 Email: <a href="mailto:reolaw.com">rroots@johnpiercelaw.com</a> Attorney for Defendant

#### **CERTIFICATE OF SERVICE**

I hereby certify that this document is being filed on this July 1, 2023, with the Clerk of the Court by using the U.S. District Court for the District of Columbia's CM/ECF system, which will send an electronic copy of to the following CM/ECF participants. From my review of the PACER account for this case the following attorneys are enrolled to receive notice and a copy through the ECF system.

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> /s/\_\_\_\_\_\_ Roger Root, Esq.