

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA §  
§  
VS. § CRIMINAL NO. 1:21-cr-00388  
§  
VIC WILLIAMS §

**MOTION TO MODIFY CONDITIONS OF RELEASE**

TO THE HONORABLE JUDGE RUDOLPH CONTRERAS:

COMES NOW, Defendant, VIC WILLIAMS, by and through his attorney, Chip Lewis, and requests that his conditions of release be modified by eliminating the requirement of home visits. As grounds in support thereof, Mr. Williams would respectfully show the Court as follows:

I.

Mr. Williams was released on bond on May 27, 2021. As a condition of his bond, Mr. Williams is required to comply with courtesy supervision by the United States Pretrial Services Agency in the Western District of Texas and comply with all rules and regulations of the supervising agency, which has included frequent visits to Mr. Williams' residence.

As stated in a previous Motion to Modify Conditions of Release, Mr. Williams works as the U.S. Senior Drilling Advisor for Kinetic Upstream Technologies. His job requires him to travel throughout the United States for various lengths of time - some trips require him to be away from his residence for over a week. Since being released on

bond, Mr. Williams has made every effort to accommodate his pretrial officer's request for home visits, including cutting several work trips short to immediately return home for a visit. To date, the United States Pretrial Services Agency has made four home visits to Mr. Williams' residence.

II.

Mr. Williams remains in perfect standing with Pretrial Services and will continue to abide by his conditions of release for the pendency of this case. Further, Mr. Williams will stay away from Washington, D.C. in accordance with his conditions of release, except for attendance of Court proceedings (if required).

III.

Given his job requirements and his perfect standing on pretrial supervision, additional home visits are unnecessary. Mr. Williams has accepted responsibility and plead guilty to the misdemeanor charge of Parading. As a result of the enormous strain these cases have put on our criminal justice system, sentencing cannot be held until February of 2022.

WHEREFORE PREMISES CONSIDERED, Mr. Williams respectfully prays that this Honorable Court modify his conditions of pre-trial release accordingly so that the requirement of home visits by the United States Pretrial Services Agency is no longer required. In the alternative, Mr. Williams requests that any required home visits be conducted via teleconference, so Mr. Williams can discharge his professional responsibilities without unnecessary interruption.

Respectfully submitted,

/s/ Chip Lewis  
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**CERTIFICATE OF CONFERENCE**

I hereby certify that I have spoken with AUSA Laura Hill, who is opposed to this Motion.

/s/ Chip Lewis  
CHIP LEWIS

**CERTIFICATE OF SERVICE**

I hereby certify that on the 29th day of October 2021, a true and correct copy of the foregoing Motion was delivered to the Government via email.

/s/Chip Lewis  
CHIP LEWIS

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**ORDER**

ON THIS DAY came to be considered a Motion to Modify Conditions of Release, and having been considered, said Motion is hereby:

\_\_\_\_\_ GRANTED. Mr. Williams' pretrial conditions of release have been modified by eliminating the requirement of home visits to Mr. Williams' residence by the United States Pretrial Supervision Agency.

\_\_\_\_\_ DENIED.

DONE AND ENTERED at Washington D.C. on this the \_\_\_\_\_ day of November 2021.

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THE HONORABLE RUDOLPH CONTRERAS  
UNITED STATES DISTRICT JUDGE