

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

UNITED STATES OF AMERICA : **Case No. 1:22-mj-00025-RMM**
:
:
v. :
:
JAKE MAXWELL, :
:
Defendant. :

UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE

COMES NOW the Defendant, Jake Maxwell, by and through counsel, Michael T. van der Veen, without objection from the Government and requests that this Honorable Court amend his Conditions of Release, and in support of said motion states as follows:

- 1) On February 10, 2022, Defendant was arrested and taken into custody in Flowery Branch, Georgia.
- 2) On that same day, Defendant appeared before U.S. Magistrate Judge Justin S. Anand and was arraigned and released with an Order Setting the Conditions of his Release.
- 3) On February 17, 2022, Defendant appeared before U.S. Magistrate Judge Zia M. Faruqi for his initial appearance and detention hearing, with the condition that Defendant must notify PSA in advance of any and all travel outside of the Middle District of Georgia.
- 4) Defendant requests to expand the conditions of his release to include the Northern District of Georgia for areas of travel.
- 5) Defendant lives in the Middle District of Georgia and works in the Northern District of Georgia.

6) Therefore, Defendant requests permission to be able to travel to both the Northern and Middle Districts of Georgia.

7) The U.S. Attorney's Office has no objection to this request.

WHEREFORE, based on the foregoing, the Defendant requests that the Court set conditions of release to allow Defendant to move freely throughout the Middle and Northern Districts of Georgia.

Respectfully Submitted,

Date: February 25, 2022

/s/ Michael T. van der Veen
Michael T. van der Veen
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 25th day of February, 2022 a copy of the foregoing *Unopposed Motion to Modify Conditions of Release* was electronically filed with the Clerk of the United States District Court using CM/ECF, with a notice of said filing to the following:

Counsel for the Government:

Joseph G. DeGaetano, AUSA
Assistant United States Attorney
Eastern District of Tennessee
Detailed to District of Columbia (Capitol Siege Unit)

/s/ Michael T. van der Veen
Michael T. van der Veen, Esq.

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ORDER

Upon consideration of the Defendant's *Unopposed Motion to Modify Conditions of Release*, it is hereby ordered by the United States District Court for the District of Columbia that the Motion be granted and that the Defendant be permitted to move freely throughout the Middle and Northern Districts of Georgia without having to notify PSA.

Date:

UNITED STATES MAGISTRATE JUDGE