

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

UNITED STATES

v.

RILEY D. KASPER

Case No. 22-148-RCL

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CONSENT MOTION TO MODIFY CONDITIONS OF RELEASE

COMES NOW the Defendant, Riley D. Kasper, by and through his attorneys, Michael E. Lawlor, and Brennan, McKenna & Lawlor, Chtd., and respectfully requests that this Honorable Court modify the conditions of release in this case. In support of this motion, counsel states the following.

1. Mr. Kasper is charged by criminal complaint with various offenses stemming from the riots at the United States Capitol on January 6, 2021.
2. On March 24, 2022, Mr. Kasper made his initial appearance before this Honorable Court and was released on conditions of pre-trial release, including being placed on a curfew between the hours of 10 p.m. and 4 a.m.
3. Mr. Kasper is supervised by United States Pretrial Officer Melissa Lach in the Western District of Wisconsin.
4. Since his release, Mr. Kasper has complied with all conditions of his supervision.

5. At this time, Mr. Kasper respectfully asks this Court to modify his conditions of release such that he be permitted to be excused from his curfew on days that his new employment requires him to travel. Mr. Kasper has taken a job with Concordia Travel as a cell tower technician. On certain days, the job will require him to travel to nearby states, which will require him to “break” curfew. Mr. Kasper’s curfew of 10 p.m. to 4 a.m. would remain on the dates that he is home and not traveling for work.

6. Undersigned contacted counsel for the Government, Mr. Stephen Rancourt, Esq. Counsel is authorized to state that the Government consents to the relief requested in this motion.

7. For these reasons, Mr. Kasper respectfully asks this Court to modify his conditions of release such that he be permitted, with the prior approval of his pretrial officer, to be relieved from his curfew when traveling for work.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this day, July 5, 2022, a copy of the foregoing was sent via ECF to the United States Attorney's Office for the District of Columbia.

/s/

Michael E. Lawlor