

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

UNITED STATES

v.

RILEY D. KASPER

Case No. 22-mj-00064-RMM

* * * * *

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, with prior approval from his Pretrial Officer, to stay overnight in a hotel to facilitate his employment. Mr. Kasper owns a Christmas Tree farm in Pulaski, WI, just outside of Green Bay. In order to run his business, he must work those fields. To help facilitate that work, Mr. Kasper respectfully asks that he be permitted, with the prior approval of his pretrial officer, to stay overnight in a hotel (the Super 8 on I-43 Business Park) when in Green Bay working on his farm. Mr. Kasper's curfew of 10 p.m. to 4 a.m. would remain, and Mr. Kasper would not be permitted to leave the Hotel during those hours of the day.

6. Undersigned contacted counsel for the Government, Mr. Joseph DeGaetano, Esq., and Pretrial Service Officer Melissa Lach about the instant request. Counsel is authorized to state that the Government as well as Pretrial Services consent 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 stay overnight in a hotel (the Super 8 on I-43 Business Park) when in Green Bay working on his farm.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this day, April 28, 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