

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)
)
 v.) Case No. 1:22-CR-00230 (RC)
)
 ADAM JACKSON,)
)
 Defendant.)

**DEFENDANT'S UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE
RELATED TO CURFEW**

Comes now the DEFENDANT, ADAM JACKSON, by and through undersigned counsel, and respectfully moves this court under 18 U.S.C. 3142(c)(3) of the Bail Reform Act, to modify the conditions of release to allow Pretrial Services to adjust the curfew hours based upon specific advance requests by Mr. Jackson. Neither the Government nor Pretrial Services object to this request. Mr. Jackson states the following in support:

I. FACTS.

1. On August 30, 2022, this Court granted Mr. Jackson's motion for release on bond. ECF No. 26.
2. The conditions of release stated, "Defendant shall comply with a curfew and must remain in his home from 9 p.m. to 6 a.m.." *Id.* at 13.
3. Pretrial Services states that the officers cannot make any adjustments to the curfew times given that the hours are set and do not include written language that authorizes them to make any changes.
4. The motion for release and oral argument highlighted Mr. Jackson's involvement with family and community, and that this was his son's senior year of high school and last football season. See ECF No. 21; 21-1.

5. If Pretrial Services is not given authorization under a modification that allows the officers to approve an arrival home by Mr. Jackson after 9:00 p.m. on a case-by-case basis for curfew, then he must file a motion with this court in advance of each event.

6. It is not uncommon for curfew orders to allow Pretrial Services the leeway to approve adjustment to curfew for requested events, especially those involving family or work.

II. LEGAL STANDARD.

Under 18 U.S.C. 3142(c)(3) of The Bail Reform Act, the Court may change the condition of release at any time.

III. DISCUSSION AND ANALYSIS.

In the near term, Mr. Jackson's attendance at his son's senior year final season of football games and other special events involving family offer stability and support to the entire family during this stressful time on the children. For example, football games are at night, and it would be beneficial if Pretrial Services upon advance request could extend curfew hours so that Mr. Jackson can stay until completion of the event. Event completion normally will include greeting his son after the game when players exit from the locker room. With the current 9:00 p.m. curfew, there are times when Mr. Jackson must depart early, whether the games are at home or away. On September 16, 2022 the senior-parent night may run past the time that would allow Mr. Jackson to remain until event completion. See Exhibit 1.

The Court has the option of modifying the curfew conditions in its order at ECF No. 26 to either allow Pretrial Services to set the curfew hours or to order that Pretrial Services is authorized to adjust hours given requests by Mr. Jackson. At this time the most efficient solution is to order that Pretrial Services may adjust the hours upon Mr. Jackson's advance request.

IV. CONCLUSION.

Because all the parties consent to the requested modification, the Court should order that Pretrial Services may adjust the curfew times based upon specific requests made in advance to Pretrial Services by Mr. Jackson. The proposed order is at Exhibit 2.

WHEREFORE, Mr. Jackson respectfully requests that the Court modify the conditions of release with respect to curfew and order that Pretrial Services is authorized to adjust the curfew times given advance requests to Pretrial Services by Mr. Jackson.

Dated: September 15, 2022

Respectfully Submitted,

/s/ Carolyn Stewart
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CERTIFICATE OF SERVICE

I hereby certify on the 15th day of September, 2022, a copy of the foregoing was served upon all parties as forwarded through the Electronic Case Filing (ECF) System.

/s/Carolyn A. Stewart, Esq.
Defense Attorney