

6. Mr. Jackson's release conditions allow travel outside the supervising district of the Southern District of Texas with prior notification of Pretrial Services. ECF No. 27 at (7)(f).

7. Pretrial Services in Texas states that they cannot authorize overnight travel outside the district. Pretrial Services in D.C. as the overarching release supervising authority states that due to the GPS monitoring device for curfew, overnight travel outside the Southern District of Texas requires either a motion for each travel involving overnight stays, or the modification proposed here where Pretrial Services may authorize overnight travel outside the supervising district for good reasons.

8. Mr. Jackson is seeking to travel with his son for invitation visits to colleges that want to recruit his son for football and academics. The purpose of Adam Jackson's travel is part of raising his family - to provide parental oversight and guidance for scholarship and academic offers, and to ensure the overall well-being of his son.

9. If Pretrial Services is not given authorization under a modification that allows the officers to approve overnight travel on a case-by-case basis, then Mr. Adam Jackson must file a motion with this court in advance of each travel.

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.

Mr. Jackson's visits with his son to colleges that offer his son scholarships or general admission will comprise part of his parental responsibilities in ensuring the well-being of his children and in providing guidance. Mr. Jackson's family is under high stress due to the serious

charges against him, and this Court's allowance of normalcy for him in his parental role impacts the entire family. Mr. Jackson's son has a serious life-decision to make as to where he might attend college. He also must consider whether playing football will be under safe conditions or even part of his future. Mr. Jackson's son will want to be able to talk to his father about all that is involved with schools' offers and what is best for his future based on both of them having the same information first-hand. Mr. Jackson takes this so seriously that he will be away from the business he runs for the travel days involved. Mr. Jackson anticipates that travel will be limited to only serious offers they receive and those that they do not eliminate. Mr. Jackson will combine out of district visits to colleges whenever possible to reduce any burden due to monitoring travel by Pretrial Services. Mr. Adam Jackson provided Pretrial Services with the travel itinerary to visit multiple out of state colleges consolidated into one single trip at the end of January 2023. He agrees to provide the itinerary with air and hotel information directly to Pretrial Services for all travel.

At this time the most efficient solution is to order that Pretrial Services may approve overnight travel upon Mr. Jackson's advance request rather than by motions for each instance.

IV. CONCLUSION.

Because all the parties consent to the requested modification, the Court should order that Pretrial Services may authorize overnight travel for up to one week based upon specific requests made in advance to Pretrial Services by Mr. Jackson. The proposed order is at Exhibit 1.

WHEREFORE, Mr. Jackson respectfully requests that the Court modify the conditions of release with respect to travel and curfew and order that Pretrial Services can approve overnight travel given advance requests to Pretrial Services by Mr. Adam Jackson.

Dated: January 17, 2023

Respectfully Submitted,

/s/ Carolyn Stewart

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CERTIFICATE OF SERVICE

I hereby certify on the 17th day of January, 2023, a copy of the foregoing was served upon all parties as forwarded through the Electronic Case Filing (ECF) System.

/s/ Carolyn Stewart, Esq.

Defense Attorney