

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

UNITED STATES OF AMERICA,

v.

ADAM LEJAY JACKSON,

Defendant.

Case No. 1:21-cr-00230-RC

DEFENDANT ADAM JACKSON'S MOTION TO MODIFY BOND CONDITIONS

DEFENDANT, ADAM JACKSON, by and through undersigned counsel, 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 Mr. Jackson to do two things: First, travel with his family on vacation, where he would travel to Kalahari Resorts located in Round Rock, Texas, from July 22, 2023 – July 25, 2023 and return home to Katy, Texas on July 25, 2023. Second, Mr. Jackson would like to drop his son off at college in Kansas and then return home. Jackson would fly from Houston to Kansas on August 4, 2023, and from Kansas to Houston on August 6, 2023, where he would then return home to Katy, Texas.

Undersigned counsel apologizes for this last-minute request and informs this Honorable Court he inquired about this request with Pretrial Services and the US Attorney's Office. AUSA David Perri did not object, and neither did Pretrial Services. Because this request is reasonable and unopposed, Undersigned Counsel respectfully requests that this Honorable Court grant this motion its entirety.

Dated: New York, NY
July 19, 2023

Respectfully submitted,

/s/ Joseph D. McBride, Esq.

Bar ID: NY0403

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Counsel for the Defendant

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was electronically served on opposing counsel on

July 19, 2023

/s/ Joseph D. McBride, Esq.