

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

ADAM LEJAY JACKSON,

Defendant.

Case No. 1:22-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 travel during the following four separate occasions:

1. Mr. Jackson requests permission to attend his son's Football at Benedictine College in Atchison, KS, on Saturday, September 23, 2023. Mr. Jackson would fly from Texas to Kansas City, MO, on Friday the 22nd and proceed to the Extended Stay America Suites Kansas City Airport at 11712 N.W. Plaza Circle, Kansas City, MO 64153. Mr. Jackson would then drive back to Texas with his entire family in a rental car the night of Sunday, the 24th and arrive back in Texas no later than Monday, the 25th.
2. Mr. Jackson requests formal permission to fly to Washington, DC, for his September 29th plea hearing in this Honorable Court. Mr. Jackson will fly from Texas to DC on Thursday the 28th, staying at the Fairfield Inn & Suites by Marriott, located at 500 H Street NW, Washington, DC 20001, and will fly back to Texas on Saturday the 30th.
3. Mr. Jackson requests permission to attend his son's Football Game at Benedictine College in Atchison, KS, on Saturday, October 21, 2023. He would fly from Texas to Kansas City, MO, on Friday, October 20, 2023, and lodge at the Atchison Inn at 500 US-73, Atchison, KS 66002. He would fly back from Kansas City, MO, to Texas on Monday, October 23rd.
4. Mr. Jackson requests permission to attend his son's Football Game at Benedictine College in Atchison, KS, on Saturday, November 11, 2023. He would be flying from Texas to Kansas City, MO, on Friday, November 10, 2023, lodge at the Atchison Inn at 500 US-73, Atchison, KS 66002, and fly back from Kansas City, MO, to Texas on Monday, November 13, 2023.

Undersigned Counsel spoke to AUSA David Perri regarding these requests on Friday, September 15, 2023. Mr. Perri has no objection. As such, Undersigned respectfully asks this Honorable Court to grant this modification request in its entirety.

Dated: Palm Beach, FL
September 15, 2023

Respectfully submitted,

/s/ Joseph D. McBride, Esq.
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CERTIFICATE OF SERVICE

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

September 15, 2023

/s/ Joseph D. McBride, Esq.