

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

**UNITED STATES OF AMERICA,**

**v.**

**MICHAEL GARETH ADAMS, :**

**Defendant.**

:  
:  
:  
:  
:  
:  
:  
:  
:

**Case No.: 21-cr-00430**

**UNITED STATES' SUPPLEMENT TO MOTION FOR PRETRIAL DETENTION OF  
DEFENDANT**

The United States, by and through its attorney, the United States Attorney for the District of Columbia, respectfully includes this addendum to its request for the pretrial detention of defendant Michael Gareth Adams. Since our motion for detention, the government has reviewed Adams's case further and coordinated with pretrial services and defense counsel. Absent a serious discovery by pretrial services in its pending report — such as troubling details relating to Adams's felony hit-and-run case in Fairfax County — the government will withdraw our motion for detention if the following conditions of release are imposed.

Adams's father should serve as his third-party custodian. Adams should be confined to his father's home, and GPS monitoring should be imposed. We expect Adams's father to appear at the detention hearing on January 13, where he can take custodial responsibility for the defendant and attest that his home will be conducive for Adams's pretrial behavior.

These conditions assuage the government's significant concern that Adams may struggle to abide by the Court's orders.

Respectfully submitted,

MATTHEW M. GRAVES  
United States Attorney

By: /s/ Tighe R. Beach  
Tighe R. Beach  
Colo. Bar No. 55328  
Assistant United States Attorney  
601 D Street, N.W.  
Washington, D.C. 20530  
Telephone: 240-278-4348  
Email: [tighe.beach@usdoj.gov](mailto:tighe.beach@usdoj.gov)

CERTIFICATE OF SERVICE

On this 12th day of January, 2023, a copy of the foregoing was served on counsel of record for the defendant via the Court's Electronic Filing System.

/s/ Tighe R. Beach

Tighe R. Beach  
Colo. Bar No. 55328  
Assistant United States Attorney  
601 D Street, N.W.  
Washington, D.C. 20530  
Telephone: 240-278-4348  
Email: [tighe.beach@usdoj.gov](mailto:tighe.beach@usdoj.gov)