

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

**UNITED STATES OF AMERICA**

**v.**

**SCOTT MILLER,**

**Defendant.**

**Crim. Action No.: 22CR412**

**SCOTT MILLER'S EMERGENCY MOTION FOR  
MODIFICATION TO CONDITONS OF RELEASE**

Scott Miller, through counsel, respectfully submits this Motion for an Order permitting him to attend a job interview on March 8, 2023, at 10:00. The current Order setting release conditions orders that he seek permission from the Court to attend job interviews. Mr. Miller has a scheduled job interview at a local business close to his home, Catocin Furnace Liquors.<sup>1</sup> He moves for permission to attend the job interview. The government does not oppose this request provided that Pre-Trial Services confirms and approves the appointment in advance. In support of this Motion, counsel states:

**Background**

Mr. Miller is before the Court charged by Indictment with various offenses arising out of the events at the Capitol on January 6, 2021.

On December 30, 2022, the Honorable Moxila A. Upadhyaya released Mr. Miller to home incarceration. The Order setting conditions of release permits Mr.

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<sup>1</sup> A letter from the owner of Catocin Liquors is attached.

Miller to “leave his residence to go work at NVR incorporated.” If the defendant is no longer employed at NVR Incorporated, the defendant must seek permission from the Court to seek other employment and/ or attend job interviews.” ECF. No. 19. Counsel previously moved this Court to modify Mr. Miller’s conditions so that he is permitted to attend neo-natal visits and work on a nearby property. ECF. No. 26. That motion is still pending. In the meantime, Mr. Miller notified undersigned counsel and probation that he has been invited to interview at Cacotin Liquors.<sup>2</sup> The interview is scheduled for **March 8 at 10:00 a.m.**

Employment of any kind will enable Mr. Miller to use his time productively and to earn income to prepare for the birth of his first child. While it may be inappropriate for some defendants to work in a liquor store, Mr. Miller does not have issues with substance abuse that would give rise to any concern in that regard.

Wherefore the reasons stated herein and any others that appear to the Court, Mr. Miller moves the Court for an Order permitting him to attend a job interview on March 8, 2023 at 10 a.m.

Respectfully submitted,

A. J. KRAMER  
FEDERAL PUBLIC DEFENDER

*/s/*

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<sup>2</sup> See attached letter.