

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF COLUMBIA

UNITED STATES

*

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v.

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Case No.: 1:21-cr-0084-PLF-2

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DANIEL P. ADAMS

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UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE

COMES NOW the Defendant by and through his attorney, Gary E. Proctor, and respectfully requests that this Honorable Court grant the modification requested herein, and in support of his motion states as follows:

1. On April 9, 2021 this Court released Mr. Adams. Among Mr. Adams' conditions of release are that he may only travel within 150 miles of his home.

2. Mr. Adams has accepted a new position of employment. As part of his orientation he is required to attend a new employee retreat, in Venice, Louisiana, which is more than 150 miles from his home. He will leave on Tuesday August 3, 2021 and return on Friday August 6, 2021.

3. Counsel has spoken to Pretrial, who indicated that they do not oppose the request, and that Mr. Adams' has been fully compliant in the almost four (4) months since his release. Counsel has also spoken with Assistant United States Attorney Troy Edwards who has authorized us to state that the Government has no objection, so long as Mr. Adams provides a detailed

itinerary to Pretrial Services ahead of time, documenting daily activities and locations, and so long as Mr. Adams checks in with Pretrial Services each day of the orientation. Accordingly, this Motion is unopposed.

WHEREFORE, the Defendant prays this Honorable Court sign the attached order and amend Mr. Adams' conditions of pretrial release.

Respectfully submitted,

/s/

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Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this day, July 30, 2021, a copy of the attached was served on all parties via ECF.

/s/

Gary E. Proctor