

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,
Plaintiff,

CASE NO. 24-CR-376 (TSC)

vs.

HON. TONYA S. CHUTKAN

ERIC LEE PETERSON,
Defendant.

MOTION FOR MODIFICATION OF BOND CONDITIONS

Defendant Eric Peterson, through his undersigned counsel, makes two requests of the Court to modify his bond conditions with respect to his travel within the United States.

First, Mr. Peterson respectfully requests that he be provided limited permission to travel to the District of Columbia for the purpose of attending President Donald Trump's second inauguration on Monday January 20, 2025. Mr. Peterson, as the government will agree, was not alleged to have done anything related to assault or vandalism at the January 6, 2021 protests. His offense was entering and remaining in the Capitol for about 8 minutes without proper authorization.

As Mr. Peterson told the government in a recent proffer with the FBI, he was not aware of the violent protesters and property damage on the Mall side of the Capitol at the time he walked from his Capitol Hill vacation rental home with a friend to enter the Capitol. Mr. Peterson is a business owner and

military veteran who has no criminal history before this case. He has no history of any kind of violence or vandalism. There is no reason to believe that Mr. Peterson will be violent or present any danger to the residents of the District if the Court grants his request to attend the inaugural event.

Mr. Peterson's second request is that he be permitted slightly broader travel within the Kansas City Metropolitan area where he lives. Currently, his bond conditions limit him to travel in the states of Missouri and Michigan. Mr. Peterson lives in a city (Kansas City) that straddles two states, Missouri and Kansas. (See **Exhibit A**, Map of Kansas City Metropolitan area). Mr. Peterson would like the ability to travel within this metropolitan area without running afoul of his bond restrictions. Thus, he is asking for his travel restrictions to be modified to allow him to travel in the entire metropolitan area within Exhibit A, including the counties of Johnson, Wyandotte, Leavenworth, Miami and Linn, all counties within the State of Kansas.

The government has informed undersigned counsel that it objects to allowing Mr. Peterson to travel to the District to attend the Presidential inauguration next month. At the time of this filing, the government has not responded to undersigned counsel's emails requesting its position regarding the second modification request.

Apart from being reasonable on their face, these two modification requests are even more appropriate in light of the incoming Trump administration's confirmations that President Trump will fully pardon those in Mr. Peterson's position on his first day in office on January 20, 2025. Thus,

his scheduled sentencing hearing before this Court on January 27, 2025 will likely be rendered moot.

For all of the above-reasons, Mr. Peterson respectfully requests that the Court modify his bond conditions so that he be permitted to travel to the District of Columbia for the upcoming Presidential Inaugural and be free to travel within the entirety of the Kansas City Metropolitan area during the pendency of this matter.

Respectfully submitted,

/s/ R. Michael Bullotta

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Dated: December 17, 2024

CERTIFICATE OF SERVICE

The undersigned, under penalty of perjury, certifies that a copy of the foregoing instrument was lodged with the court through the Utilities function of the ECF system on December 17, 2024.

/s/ R. Michael Bullotta _____

R. MICHAEL BULLOTTA
Counsel for Eric Peterson