

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

CLIFFORD MACKRELL,

Defendant.

Case No. 21-cr-276 (CKK)

MOTION TO MODIFY CONDITIONS OF RELEASE

Mr. Clifford Mackrell respectfully moves this Honorable Court to modify his release conditions. Specifically, Mr. Mackrell requests the Court remove the condition that he be required to wear a 24 hour ankle monitor.

Mr. Mackrell has been on pre-trial release for almost two years. He has worn an ankle monitor for the entire duration of that time. Mr. Mackrell has been fully compliant with the conditions of his release: he is diligent about reporting to Pretrial Services; drug screens have been negative; and there have been no violations of his electronic monitoring condition.

Given his compliance in the past two years, Mr. Mackrell respectfully submits that the ankle monitor is not part of the “least restrictive” conditions necessary to reasonably assure community safety or his return to court. *See* 18 U.S.C. § 3142 (c)(B). Additionally, the condition to wear an ankle monitor for such an extended period of time has become overly burdensome for Mr. Mackrell. His employment requires him to be moving on his feet most of the day, which in turn

can create a painful experience for him. Further, he is unable to wear boots while outfitted with the ankle monitor. This presents a number of issues in the winter as he generally works outdoors.

Mr. Mackrell does not object to any other conditions of release. Pretrial Services has represented that they will defer to the Court with regards to Mr. Mackrell's request.

For the foregoing reasons, Mr. Mackrell respectfully request that this Court remove the condition that he wear an electronic ankle monitor.

Respectfully submitted,

A. J. Kramer
Federal Public Defender

/s/
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