

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

**UNITED STATES OF AMERICA**

**vs.**

**DONOVAN CROWL**  
**Defendant**

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**Case No. 1:21-cr-00028-APM-2**

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**SECOND CONSENT MOTION TO MODIFY CONDITIONS  
OF PRETRIAL RELEASE TO AUTHORIZE HOSPITAL VISIT**

Donovan Crowl, by his undersigned counsel, respectfully requests that this Honorable Court modify its Order to authorize Mr. Crowl to travel from August 11, 2021 through August 23, 2021 to visit his mother, who is hospitalized in an intensive care unit in Missouri. She has taken a turn for the worse and is expected to expire in the next few days. AUSA Kathryn Rakoczy consents to this request, as more fully set forth below. Pretrial Services Officer Holman defers to Government counsel.

1. On March 26, 2021, this Court released Mr. Crowl to home incarceration with electronic monitoring. Order, ECF 115. The Court has modified that Order to allow Mr. Crowl to visit his mother in the hospital once before (ECF 178, 4/23/21); for work release (ECF 191, 5/19/21).<sup>1</sup> Mr. Crowl has been in in full compliance with the conditions of release. *See* PSA Status Report (ECF 322, 8/9/21)

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<sup>1</sup> In granting work release, the Court entered a Minute Order that states in relevant part:

To the extent the conditions of release need to be designated as Home Confinement instead of Home Incarceration, such adjustment is granted. All other conditions of release shall remain in place. See the attached Order for additional details. Signed by Judge Amit P. Mehta on 5/19/2021. (lcapm1) (Entered: 05/19/2021)

2. Mr. Crowl's mother, who has been hospitalized for some time is expected to expire in the next day or two.

3. Mr. Crowl respectfully requests that the Court modify the condition of release to authorize him to travel to the hospital in Missouri, by automobile with his daughter and remain in the area until funeral services.

4. Mr. Crowl would stay with other family members overnight at a hotel, that is attached by a walkway to the hospital.

5. Funeral services are being planned in Illinois, the state of residence for Mr. Crowl's brother and other family members.

6. For the remainder of the time until funeral services are held, Mr. Crowl would stay at his brother's home in Illinois.

7. Counsel has provided to AUSA Rakoczy and to Pretrial Services the name, address and phone number of the hospital; the hotel where he will be staying with family members; and of family members with whom Mr. Crowl will be staying.

8. As part of this modification, Mr. Crowl would be required to make daily phone calls to his Pretrial Services Officer in Ohio and contact the Pretrial Services Officer as soon as he returns to Ohio.

9. Mr. Crowl would leave his home in Ohio today, August 11, 2021, as soon as the Court modifies the conditions of release. He would return on August 23, 2021. He is traveling to Missouri by automobile with his daughter. The return to Ohio would be by automobile with his daughter or other family member.

10. All other conditions of pretrial release would remain in place.

WHEREFORE, Mr. Crowl respectfully moves that this Honorable Court modify its Order Setting Conditions of Release to authorize Mr. Crowl to travel out of town from August 11, 2021 through August 23, 2021 to visit his dying mother, who is hospitalized in extremis in Missouri and stay overnight with family members.

Respectfully submitted,

/s/ Carmen D. Hernandez

**Carmen D. Hernandez**

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#### **CERTIFICATE OF SERVICE**

I hereby certify that the instant notice was served on all counsel of record 11<sup>th</sup> day of August, 2021 on all counsel of record via ECF.

/s/ Carmen D. Hernandez

**Carmen D. Hernandez**

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**ORDER**

Upon consideration of the Second Consent Motion to Modify Conditions of Pretrial Release to Authorize Hospital Visit filed by Donovan Crowl, good cause having been shown, it is this \_\_\_\_\_ day of August, 2021, by the United States District Court for the District of Columbia

**ORDERED:**

1. That the Conditions of Pretrial Release are hereby **MODIFIED** to allow Mr. Crowl to travel out of town from August 11, 2021 through August 23, 2021 to visit his dying mother at the hospital in Missouri and attend funeral services in Illinois.
2. Between August 11, 2021 and August 23, 2021, Mr. Crowl shall not be required to submit to location monitoring services but instead shall report by telephone to Pretrial Services once a day. As soon as he returns to Ohio, Mr. Crowl shall notify his Pretrial Services Officer.
3. All other Conditions of Release shall remain in force.

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**HONORABLE AMIT P. MEHTA  
United States District Judge**

