

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

**UNITED STATES OF AMERICA** )

**v.** )

**CR. NO. 21-114 (TJK)**

**KEVIN STRONG** )

\_\_\_\_\_ )

**MOTION FOR RELEASE OF CASH BOND**

Kevin Strong, through undersigned counsel, respectfully moves this Honorable Court to release the appearance bond of \$50,000 back to his father, Robert Strong. In support of this motion, Mr. Strong states as follows:

1. On or January 22, 2021, Mr. Kevin Strong was arrested in California, and appeared in the U.S. District Court for the Central District of California. See Docket No. 21-mj-25 (C.D. Ca.), (Exhibit 1).
2. At the time of his appearance, the Court set an appearance bond of \$50,000. Exh. 1, ECF No. 4.
3. Six days later, on January 28, 2021, Mr. Strong's father, Robert Strong, posted the \$50,000 bond. Exh. 1 at ECF No. 13.
4. On February 11, 2021, Mr. Strong, who was released in the California case, appeared by video for his initial appearance in this case. Case No. 21-cr-114 (D.C.), Minute entry for February 11, 2021.
5. He was released on his personal recognizance and no money bond was required.
6. Mr. Strong is supervised by the Pretrial Services Agency for the District of Columbia. See ECF No. 14 in No. 21-cr-114.

7. On March 26, 2021, the U.S. District Court for the Central District of California released the funds to the U.S. District Court for the District of Columbia. See Docket No. 21-mj-25 (C.D. Ca.), ECF No. 17 (Exhibit 2).
8. Now that the funds are in the possession of this Court, Mr. Strong requests that the funds be released back to his father, Robert Strong.
9. Furthermore, Robert Strong is desperate need of the funds to assist an ill family member.
10. Undersigned counsel contacted government counsel who informed her to state that the government takes no position on this motion.

WHEREFORE, Mr. Strong requests that this Honorable Court enter an Order to release the appearance bond to his father, Robert Strong.

Respectfully Submitted,

A.J. KRAMER  
FEDERAL PUBLIC DEFENDER

/s/  
Ubong E. Akpan  
Assistant Federal Public Defender  
625 Indiana Ave., N.W.  
Washington, D.C. 20004  
(202) 208-7500

**CERTIFICATE OF SERVICE**

I, Ubong E. Akpan, certify that on this 21<sup>st</sup> day of April 2021, I caused a copy of the foregoing Motion to be filed through the Electronic Case Filing (“ECF”) system and served a copy on counsel for the government through the ECF.

/s/

Ubong E. Akpan  
Assistant Federal Public Defender

# EXHIBIT 1

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CLOSED,PASPR

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA (Eastern Division - Riverside)  
CRIMINAL DOCKET FOR CASE #: 5:21-mj-00025-DUTY-1**

Case title: USA v. Strong

Date Filed: 01/22/2021

Other court case number: 1:21-mj-000151 District of  
Columbia

Date Terminated: 01/28/2021

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Assigned to: Duty Magistrate Judge

**Defendant (1)**

**Kevin Strong**  
REG 26784-509  
*TERMINATED: 01/28/2021*

represented by **Young J. Kim**  
Federal Public Defenders Office  
Riverside Division  
3801 University Avenue Suite 700  
Riverside, CA 92501  
951-276-6346  
Fax: 951-276-6368  
Email: Young\_Kim@fd.org  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*  
*Designation: Public Defender or*  
*Community Defender Appointment*

**Pending Counts**

None

**Disposition**

**Highest Offense Level (Opening)**

None

**Terminated Counts**

None

**Disposition**

**Highest Offense Level (Terminated)**

None

**Complaints**

**Disposition**

None

**Plaintiff**

USA

represented by **US Attorney's Office**

AUSA - Office of US Attorney

Criminal Division - US Courthouse

312 North Spring Street 12th Floor

Los Angeles, CA 90012-4700

213-894-2434

Email: USACAC.Criminal@usdoj.gov

*LEAD ATTORNEY**ATTORNEY TO BE NOTICED**Designation: Assistant US Attorney*

Date Filed	#	Docket Text
01/22/2021	<a href="#"><u>1</u></a>	AFFIDAVIT RE: OUT-OF-DISTRICT WARRANT (Rule 5(c)(3)) filed as to defendant Kevin Strong, originating in the District of Columbia. Defendant charged in violation of: 18:1752(a)(1), 18:1752(a)(2), 40:5104(e)(2)(D), (G). Signed by agent Eric Norwood, FBI, Special Agent. filed by Plaintiff USA. (cio) (Entered: 01/28/2021)
01/22/2021	<a href="#"><u>2</u></a>	REPORT COMMENCING CRIMINAL ACTION as to Defendant Kevin Strong; defendants Year of Birth: 1976; date of arrest: 1/22/2021 USMS# 26784-509 (cio) (Entered: 01/28/2021)
01/22/2021	<a href="#"><u>3</u></a>	Defendant Kevin Strong arrested on warrant issued by the USDC District of Columbia at Washington. (Attachments: # <a href="#"><u>1</u></a> Signed Application)(cio) (Entered: 01/28/2021)
01/22/2021	<a href="#"><u>4</u></a>	MINUTES OF ARREST ON OUT OF DISTRICT WARRANT held before Magistrate Judge Shashi H. Kewalramani as to Defendant Kevin Strong Defendant arraigned and states true name is as charged. Attorney: Young J Kim for Kevin Strong, Deputy Federal Public Defender, present. Court orders bail set as: Kevin Strong (1) \$50,000 Appearance Bond, (SEE BOND ATTACHED). Defendant remanded to the custody or currently in the custody of the US Marshal. Court orders defendant held to answer to District of Columbia. Bond to Transfer. Defendant ordered to report on 02/04/2021 at 1:00pm. Court Reporter: Anne Kielwasser. (cio) (Entered: 01/28/2021)
01/22/2021	<a href="#"><u>5</u></a>	FINANCIAL AFFIDAVIT filed as to Defendant Kevin Strong. (Not for Public View pursuant to the E-Government Act of 2002) (cio) (Entered: 01/28/2021)
01/22/2021	<a href="#"><u>6</u></a>	DECLARATION RE: PASSPORT filed by Defendant Kevin Strong, declaring that I have been issued a passport or other travel document(s), but they are not currently in my possession. I will surrender any passport or other travel document(s) issued to me, to the U.S. Pretrial Services Agency by the deadline imposed. I will not apply for a passport or other travel document during the pendency of this case. (cio) (Entered: 01/28/2021)

01/22/2021	<a href="#"><u>7</u></a>	CONSENT to Video Conference/Telephonic Conference filed by Defendant Kevin Strong. (cio) (Entered: 01/28/2021)
01/22/2021	<a href="#"><u>8</u></a>	ADVISEMENT OF STATUTORY & CONSTITUTIONAL RIGHTS filed by Defendant Kevin Strong. (cio) (Entered: 01/28/2021)
01/22/2021	<a href="#"><u>10</u></a>	IN CHAMBERS MANDATORY RULE 5(f) ORDER by Magistrate Judge Shashi H. Kewalramani: as to Defendant Kevin Strong (cio) (Entered: 01/28/2021)
01/22/2021	<a href="#"><u>11</u></a>	WAIVER OF RIGHTS approved by Magistrate Judge Shashi H. Kewalramani as to Defendant Kevin Strong. (cio) (Entered: 01/28/2021)
01/22/2021	<a href="#"><u>12</u></a>	ORDER FOR CONTRIBUTION TOWARD ATTORNEYS FEES by Magistrate Judge Shashi H. Kewalramani as to Kevin Strong. Funds in the amount of \$126/hour, shall be paid by the defendant to the Clerks Office as follows: All cashiers checks and/or money orders must be made payable to: CLERK, U.S. DISTRICT COURT and mailed to: United States District Court, Central District of California, 255 East Temple Street, Suite TS-134, Los Angeles, California 90012, Attn: Fiscal Section. Your name and case number must be included on the cashiers check or money order. (cio) (Entered: 01/28/2021)
01/25/2021	<a href="#"><u>9</u></a>	Affidavit of Third-Party Custodian, Robert Strong agrees to supervise defendant Kevin Strong. (cio) (Entered: 01/28/2021)
01/28/2021		Notice to District of Columbia of a Rule 5 or Rule 32 Initial Appearance as to Defendant Kevin Strong. Your case number is: 1:21-mj-000151. The clerk will transmit any restricted documents via email. Using your PACER account, you may retrieve the docket sheet and any text-only entries via the case number link. The following document link(s) is also provided: <a href="#"><u>4</u></a> Initial Appearance - Arrest on Out of District Warrant - Rule 5(c)(3) (fka Rule 40),,. If you require certified copies of any documents, please send a request to email address CrimIntakeCourtDocs-LA@cacd.uscourts.gov (cio) (Entered: 01/28/2021)
01/28/2021	13	FINANCIAL ENTRY as to Defendant Kevin Strong: Received \$50,000.00 into the registry of the Court from Robert M. Strong, Jr on 01/25/2021. Receipt number RS011143. (pri) (Entered: 01/28/2021)
02/22/2021	<a href="#"><u>14</u></a>	PASSPORT RECEIPT from U. S. Pretrial Services as to Defendant Kevin Strong. USA passport was received on 02/22/2021. (cio) (Entered: 02/22/2021)
02/22/2021	<a href="#"><u>15</u></a>	PASSPORT RECEIPT from U. S. Pretrial Services as to Defendant Kevin Strong. USA passport was received on 02/22/2021. (cio) (Entered: 02/22/2021)
02/22/2021		Notice to District of Columbia of a Rule 5 or Rule 32 Initial Appearance as to Defendant Kevin Strong. Your case number is: 1:21-mj-000151. Using your PACER account, you may retrieve the docket sheet and any text-only entries via the case number link. The following document link(s) is also provided: <a href="#"><u>14</u></a> Passport Receipt, <a href="#"><u>15</u></a> Passport Receipt. The finance office will transmit the cash deposit The Clerk will forward the passport to you If you require certified copies of any documents, please send a request to email address CrimIntakeCourtDocs-LA@cacd.uscourts.gov (cio) (Entered: 02/22/2021)

02/22/2021	<a href="#">16</a>	BOND AND CONDITIONS OF RELEASE filed as to Defendant Kevin Strong conditions of release: \$50,000 Appearance Bond (SEE BOND ATTACHED FOR ADDITIONAL CONDITIONS) approved by Magistrate Judge Kenly Kiya Kato. (cio) (Entered: 02/23/2021)
03/31/2021	17	FINANCIAL ENTRY as to Defendant Kevin Strong: Disbursed \$50,000.00 from the registry of the Court to USDC DISTRICT OF COLUMBIA on 03/26/2021. (pri) (Entered: 03/31/2021)

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<b>PACER Service Center</b>			
<b>Transaction Receipt</b>			
04/13/2021 15:08:29			
<b>PACER Login:</b>	ubong_akpan	<b>Client Code:</b>	
<b>Description:</b>	Docket Report	<b>Search Criteria:</b>	5:21-mj-00025-DUTY End date: 4/13/2021
<b>Billable Pages:</b>	3	<b>Cost:</b>	0.30
<b>Exempt flag:</b>	Exempt	<b>Exempt reason:</b>	Always

# EXHIBIT 2

**From:** [cacd\\_ecfmail@acd.uscourts.gov](mailto:cacd_ecfmail@acd.uscourts.gov) <[cacd\\_ecfmail@acd.uscourts.gov](mailto:cacd_ecfmail@acd.uscourts.gov)>  
**Sent:** Wednesday, March 31, 2021 10:20 AM  
**To:** [noreply@ao.uscourts.gov](mailto:noreply@ao.uscourts.gov)  
**Subject:** Activity in Case 5:21-mj-00025-DUTY USA v. Strong Financial Entry

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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

**Notice of Electronic Filing**

The following transaction was entered on 3/31/2021 at 10:20 AM PDT and filed on 3/31/2021

**Case Name:** USA v. Strong  
**Case Number:** [5:21-mj-00025-DUTY](#)  
**Filer:**  
**Document Number:** 17(No document attached)

**FINANCIAL ENTRY as to Defendant Kevin Strong: Disbursed \$50,000.00 from the registry of the Court to USDC DISTRICT OF COLUMBIA on 03/26/2021. (pri)**

**5:21-mj-00025-DUTY-1 Notice has been electronically mailed to:**

US Attorney's Office [USACAC.Criminal@usdoj.gov](mailto:USACAC.Criminal@usdoj.gov), [CaseView.ECF@usdoj.gov](mailto:CaseView.ECF@usdoj.gov)

Young J. Kim [Young\\_Kim@fd.org](mailto:Young_Kim@fd.org), [isabel\\_rivera@fd.org](mailto:isabel_rivera@fd.org), [zzCAC\\_FPD\\_Document\\_Receiving@fd.org](mailto:zzCAC_FPD_Document_Receiving@fd.org)

**5:21-mj-00025-DUTY-1 Notice has been delivered by First Class U. S. Mail or by other means BY THE FILER to :**

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

**UNITED STATES OF AMERICA** )

**v.** )

**CR. NO. 21-114 (TJK)**

**KEVIN STRONG** )

\_\_\_\_\_ )

**ORDER**

Upon consideration of the Motion for Release of Cash Bond and for good cause shown, it is hereby

**ORDERED** that the Motion is **GRANTED**; and it is

**FURTHER ORDERED** that the Clerk's Office shall release the cash bond to Robert Strong.

**SO ORDERED.**

DATE: April \_\_, 2021

\_\_\_\_\_  
JUDGE TIMOTHY J. KELLY  
UNITED STATES DISTRICT COURT