

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

UNITED STATES OF AMERICA :
 : **CASE NO. 21-cr-179-RCL**
 v. :
 :
RACHEL POWELL :
 :
 Defendant. :

**THE GOVERNMENT’S REPOSE TO THE DEFENDANT’S
MOTION TO MODIFY CONDITIONS**

On September 23, 2021, the defendant, Rachel Powell, filed a motion under seal requesting a modification to her pretrial release conditions. Specifically, the defendant requests that she be allowed to move to a new residence, which is an apartment that is owed by her new employer, at the same address as her work location.

At this time, the government would request that prior to her move, the Pretrial Services Agency be first permitted to conduct a home visit of the location.

On September 23, 2021, the undersigned attorney spoke to Pretrial Services Officer (“PSO”) Mara Williams, who is assigned to the defendant in the Western District of Pennsylvania. PSO Williams informed the undersigned attorney that the defendant’s employer is her significant other. The defendant is seeking to rent an apartment above her significant other’s garage, which does not have a kitchen or shower. To use the kitchen or shower, the defendant would presumably need to enter her significant other’s house, which is separate from the garage/apartment. PSO Williams expressed concern that the defendant traveling to her significant other’s house to cook or shower, at random times during the day and night, would be difficult with her location monitoring, as the significant other’s house is outside the radius of the defendant’s location monitoring.

Furthermore, PSO Williams stated that she previously conducted a video tour of the location and that once the defendant left her significant other's house and walked towards the apartment, the cellular service was spotty.

PSO Williams further told the undersigned attorney that she raised these issues with the defendant, and once she did, the defendant offered to live inside of her significant other's house and rent a room. PSO Williams has not had an opportunity to visit the significant other's house either.

PSO Williams further stated that as of right now, half of the officers in her office are gone, leaving the office running at 50 percent capacity. PSO Williams estimates that she will try to do a home visit in the next two weeks and provide further findings.

Respectfully submitted,

CHANNING D. PHILLIPS
Acting United States Attorney
DC Bar No. 415793

By: /s/ Lucy Sun
Lucy Sun
Assistant United States Attorney
Massachusetts Bar Number 691766
United States Attorney's Office
Detailee – Federal Major Crimes
555 Fourth Street, N.W.
Washington, D.C. 20530
Telephone: (617) 590-9468
Email: lucy.sun@usdoj.gov

Certificate of Service

I hereby certify that on September 23, 2021, I caused a copy of the foregoing response to be served on counsel of record via electronic filing.

/s/ Lucy Sun _____
LUCY SUN
Assistant United States Attorney