

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

UNITED STATES OF AMERICA)	
)	Case no. 1:21-cr-160
Plaintiff,)	
)	
v.)	UNOPPOSED MOTION TO MODIFY
)	CONDITIONS OF PRETRIAL RELEASE
Felicia Konold,)	
)	
Defendant.)	

DEFENDANTS MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE

COMES NOW the defendant, Felicia Konold, by and through undersigned counsel, pursuant to 18 U.S.C. §3142 and Rule 12 of the Federal Rules of Criminal Procedure, and hereby respectfully request that this honorable court to enter an order modifying her pretrial release conditions by suspending the requirement of that she be subject to Stand Alone Monitoring with GPS. In support of this motion the defendant states the following in support:

1. The defendant is on pretrial release and under the supervision of the U.S. Probation and Pretrial Services Office for the District of Arizona.
2. The defendant has consulted with Pretrial Services officer, Manny Calderon, who has advised her to seek a court order to allow for termination of the Stand Alone Monitoring with GPS immediately until six (6) weeks post-partum.
3. The defendant respectfully requests that the Court modify the conditions of her pretrial release by suspending the Stand Alone Monitoring with GPS requirement in light of the recently received information from her physician, , Dr. J. Thad Decker M.D. At Ms. Konolds appointment on September 20, 2021 the Physician notified her of the potential to spontaneously deliver anywhere from now until forty-one (41) weeks. Ms. Konold when pregnant with her first son delivered six (6) weeks early. As indicated by a Physicians note received on September 20,

2021, the prior pre-term delivery increases the likelihood of an early labor in her current pregnancy. In addition, Ms. Konold is planning to have a water-birth and the continued restriction that is imposed, even with the governments addendum to removing the device two (2) weeks before her due-date will prevent Ms. Konold from delivering in this manner.

4. The defendant respectfully requests that the Court modify the conditions of removal of her Stand Alone Monitoring with GPS requirement two (2) weeks after delivery to six (6) weeks to assist in her recovery and allow for adequate care of her new-born child. As indicated by Ms. Konolds physician, Dr. J. Thad Decker M.D., a vaginal delivery which Ms. Konold is planning to have, requires a six (6) week recovery period.

WHEREFORE, we pray that the Court vacate the location monitoring and ankle bracelet requirements in this case.

KODNER WATKINS, LC

By: /s/ Albert S. Watkins
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CERTIFICATE OF SERVICE

Signature above is also certification that on September 21th, 2021 a true and correct copy of the foregoing was electronically filed with the Clerk of the Court utilizing the CM/ECF system which will send notification of such filing to all parties of record.

J. Thad Decker, M.D., FACOG

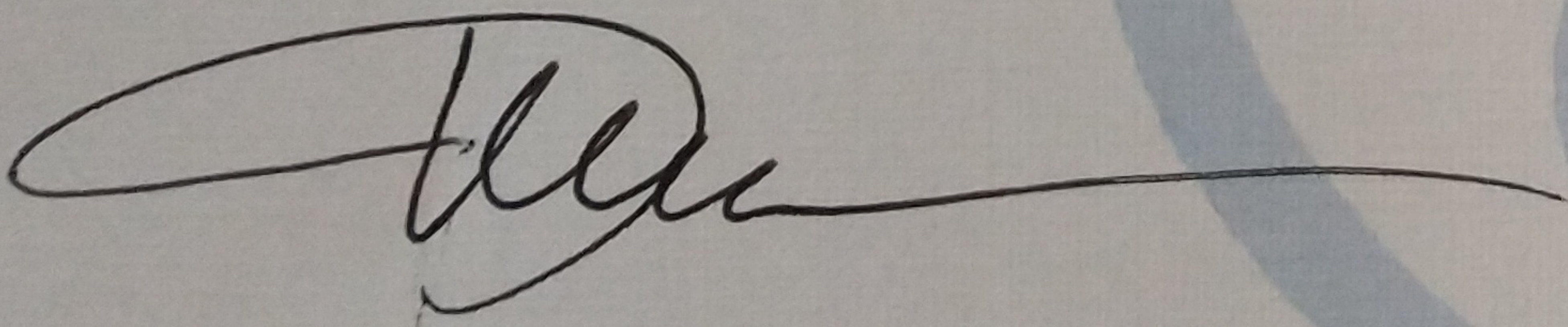
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September 20, 2021

To Whom It May Concern,

Felicia Konold, dob 02/25/1994, is a pregnant patient under my care with an estimated due date of 11/07/2021. Based on Felicia's history of preterm delivery and the fact that delivery of any pregnancy is spontaneous, she can potentially deliver from now until 41 weeks gestation. If she has a vaginal delivery her recovery will be 6 weeks and a c-section delivery will require 8 weeks recovery. Please contact my office if you have any further questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Thad Decker', with a long horizontal flourish extending to the right.

J. Thad Decker, MD