

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

UNITED STATES OF AMERICA)	
)	Case no. 1:21-cr-160
Plaintiff,)	
)	
v.)	COURT ORDERED STATUS
)	MEMORANDUM ON DEFENDANTS
Felicia Konold,)	ON DEFENDANTS PRETRIAL
)	RELEASE
Defendant.)	

STATUS MEMORANDUM ON DEFENDANTS PRETRIAL RELEASE

COMES NOW the defendant, Felicia Konold, by and through undersigned counsel, and hereby respectfully submit to this honorable court a memorandum on Defendants status during pretrial release:

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 permanently.
3. The defendant has not had any violations over the ten (10) months while on pretrial release. This includes when she was allowed for cross-country travel multiple times for Attorney-Client visits.
4. The defendant has not displayed any behavior that could suggest herself as a danger to society.
5. The defendant has recently lost her aunt to COVID-19 who was the only other caregiver in her home to assist with the duties required in caring for a newborn. In essence the defendant is alone caring for two children with no assistance. The restraint imposed by replacing

her Stand Alone Monitoring would impeded her ability to care for her newborn child as well as her son.

6. The defendant has successfully delivered a healthy baby by natural means and without complications.

7. Because of the loss of her aunt, Defendant is without the contemplated assistance of her aunt to care for, help bathe, feed, tend to, watch, transport to and from doctors, garner food, and handle all of the attendant duties of a single mother (many of which require spontaneous decision making relating to same).

8. The defendant respectfully requests that the Court modify the conditions of removal of her Stand Alone Monitoring with GPS requirement permanently to allow for adequate care of her new-born child.

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

KODNER WATKINS, LC

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CERTIFICATE OF SERVICE

Signature above is also certification that on November 6th, 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.