

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

UNITED STATES OF AMERICA

vs.

**THOMAS CALDWELL,
DONOVAN CROWL,
GRAYDON YOUNG,
LAURA STEELE, and
CONNIE MEGGS,**

Defendants

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

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**DEFENDANTS' CONSENT MOTION TO
MODIFY CONDITIONS OF PRETRIAL RELEASE**

Donovan Crowl, by his undersigned counsel, respectfully moves this Honorable Court to modify the Conditions of Release relating to internet use. Government counsel consent to this request. Counsel for Defendants Caldwell, Steele, Connie Meggs and Young join in the request to modify the conditions of release of each of his or her client.

1. The Order releasing Defendants Caldwell, Crowl, Connie Meggs, Steele and Young to home incarceration prohibits each of them from accessing the internet. Each Order contains a Condition that states:

GPS Monitoring: Defendant is not to have any access to computers, smart phones, tablets, or any device that would allow him [or her] to communicate through either encrypted or non-encrypted applications.”

Condition 7(t) (Caldwell Order, ECF 75); Condition 7(s) (Steele Order, ECF 102); (Connie Meggs Order, ECF 104); (Crowl Order, ECF 115); (Young Order, ECF 119).

2. After consultation, Government counsel and counsel for the above-named defendants consent to a Modification of the Release Order as follows:

The defendant may use an electronic device with Internet access for the sole purposes of: (1) attending court hearings, (2) communicating with his/her counsel and defense team, and (3) reviewing discovery materials with counsel and defense team. The defendant may not use electronic devices connected to the Internet for any other purposes.

3. In addition, with respect solely to Mr. Crowl, as noted by the Court at the Status Conference held on April 6, 2021, the Order (ECF 126) modifying condition of release with respect to his use of a flip phone shall be amended to delete the second clause that states

That Mr. Crowl shall be required to share his monthly phone bill that reflects call/text records with his Pretrial Services Officer, to make sure he is only using the device for lawyer communications and other permitted entities or persons.

Order, clause 2 (ECF 126, 4/2/2021).

4. All other conditions of release shall remain in effect.

WHEREFORE, Defendants Caldwell, Crowl, Steele, Connie Meggs and Young respectfully request that the Court modify their conditions of release to authorize internet use for the sole purpose of (1) attending court hearings, (2) communicating with his/her counsel and defense team, and (3) reviewing discovery materials with counsel and defense team. With respect to Mr. Crowl, the Order Modifying his Conditions of Release (ECF 126, 4/2/2021) to delete the second clause.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that the instant notice was served on all counsel of record 14th day of April, 2021 on all counsel of record via ECF.

/s/

Carmen D. Hernandez

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ORDER

Upon consideration of the Defendants’ Consent Motion to Modify Conditions of Pretrial Release, good cause having been shown, it is this _____ day of April, 2021, **ORDERED:**

1. That the Order Setting Conditions of Release as to Defendants Caldwell, Crowl, Young, Steele and Connie Meggs is hereby **MODIFIED** as follows:

The defendant may use an electronic device with Internet access for the sole purposes of: (1) attending court hearings; (2) communicating with his/her counsel and defense team; and (3) reviewing discovery materials with counsel and defense team. The defendant may not use electronic devices connected to the Internet for any other purposes.

2. That the Order Modifying Conditions of Release as to Defendant Crowl (ECF 126, 4/2/2021) is hereby **MODIFIED** to eliminate the second clause that would otherwise require him to share his monthly flip-phone bill with his Pretrial Services Officer.

3. That all other Conditions of Release remain in effect.

HONORABLE AMIT P. MEHTA
United States District Judge