

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

vs.

DONOVAN CROWL  
Defendant

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Case No. 1:21-cr-00028-APM-2

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CONSENT MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE

Donovan Crawl, by his undersigned counsel, respectfully requests that this Honorable Court modify its Order to authorize Mr. Crawl to travel out of town from April 24, 2021 through May 3, 2021 to visit his mother, who is hospitalized in an intensive care unit in extremis in Missouri. AUSA Kathryn Rakoczy consents to this request, as more fully set forth below.

1. On March 26, 2021, this Court released Mr. Crawl to home incarceration with electronic monitoring. Order, ECF 115.
2. Mr. Crawl’s mother who has leukemia has recently taken a turn for the worse and is in extremis. She is in an intensive care unit, intubated, and is receiving dialysis treatment.
3. Mr. Crawl respectfully requests that the Court modify the condition of home incarceration with electronic monitoring to authorize him to travel to his brother’s home in Illinois, where he would stay overnight from April 24, 2021 through May 3, 2021. From his brother’s home, he would travel to the hospital in Missouri to visit his dying mother. Mr. Crawl’s brother lives several hours away from the hospital. All travel will be by car, with either Mr. Crawl’s son or his brother operating the motor vehicle.<sup>1</sup>

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<sup>1</sup> Mr. Crawl does not currently have a car or a driver’s license.

4. Mr. Crowl respectfully requests that the Court modify the conditions of home incarceration from April 24, 2021 through and including May 3, 2021 so that he can stay at his brother's home and travel back and forth to the hospital.

5. At the last moments of the mother's life, Mr. Crowl's brother plans to stay overnight in a hotel near the hospital if necessary. In such an event, Mr. Crowl would respectfully request that the Court authorize him to stay with his brother at the hotel.

6. Counsel has provided the name and address of the hospital as well as the name, address and phone number of Mr. Crowl's brother to AUSA Rakoczy and to Pretrial Services.

7. As part of this modification, Mr. Crowl would make daily calls to his Pretrial Services Officer and contact the Pretrial Services Officer as soon as he returns to Ohio.

8. At all times when he is not at the hospital, Mr. Crowl would be required to remain overnight at his brother's home. In the event, Mr. Crowl's brother would seek to stay overnight at a hotel near the hospital, Mr. Crowl would be authorized to stay at the hotel so long as he notifies the Pretrial Services Officer in advance and provides the name, address and phone number of the hotel.

9. Since release to home incarceration, Mr. Crowl has complied with all conditions.

10. Counsel sought to consult with the Pretrial Services Officer in DC, who is not in the office today so spoke to a duty officer. Counsel consulted with the Pretrial Services Officer in Ohio, who suggested that Mr. Crowl's Pretrial Services Officer in DC be consulted. However, due to the emergency nature of this request and with the consent of the United States, Mr. Crowl respectfully requests that the Court grant this Motion.

11. All other conditions shall remain the same.

WHEREFORE, Mr. Crowl respectfully moves that this Honorable Court modify its Order Setting Conditions of Release to authorize Mr. Crowl to travel out of town from April 24, 2021 through May 3, 2021 to visit his mother, who is hospitalized in an intensive care unit in extremis in Missouri and stay overnight with his brother in Illinois.

Respectfully submitted,

/s/ Carmen D. Hernandez

**Carmen D. Hernandez**

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#### **CERTIFICATE OF SERVICE**

I hereby certify that the instant notice was served on all counsel of record 23<sup>rd</sup> day of April, 2021 on all counsel of record via ECF.

/s/ Carmen D. Hernandez

**Carmen D. Hernandez**

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**ORDER**

Upon consideration of the Consent Motion to Modify Conditions of Pretrial Release filed by Donovan Crowl, good cause having been shown, it is this 23<sup>rd</sup> day of April, 2021, by the United States District Court for the District of Columbia

**ORDERED:**

1. That the Conditions of Pretrial Release are hereby **MODIFIED** to allow Mr. Crowl to travel out of town from April 24, 2021 through May 3, 2021 to visit his mother at the hospital in Missouri and reside with his brother in Illinois. With advance notice to Pretrial Services, Mr. Crowl may stay at a hotel near the hospital, providing the name, address, phone number of the hotel.
2. Mr. Crowl shall report by telephone to Pretrial Services once a day. As soon as he returns to Ohio, he shall notify his Pretrial Services Officer.
3. All other Conditions of Release shall remain in force.

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**HONORABLE AMIT P. MEHTA  
United States District Judge**