

**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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**MOTION TO MODIFY  
CONDITIONS OF PRETRIAL RELEASE**

Donovan Crowl, by his undersigned counsel, respectfully requests that this Honorable Court modify its Order Setting Conditions of Release to authorize work-release for Mr. Crowl. The Government will not oppose the request but will file a response. The Pretrial Services Officers in the Southern District of Ohio and in the District of Columbia do not object.

1. The Order releasing Mr. Crowl restricts him to his residence 24-hours a day “except for medical necessities and court appearances or other activities specifically approved by the court.” Detention Order (ECF 115), condition 7(p)(3).

2. Mr. Crowl has been offered a job doing plumbing and other construction work for the next six weeks, working five days a week, 6:00 a.m. to 4:00 p.m., weather permitting (construction work is generally not performed in inclement weather).<sup>1</sup>

3. Were the Court to approve the modification, Mr. Crowl would start work immediately thereafter with advance notice to Pretrial Services.

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<sup>1</sup> The offer-letter that includes the name and address of the employer and the terms of employment has been provided to AUSA Kathryn Rakoczy and to Pretrial Services. Mr. Crowl has made arrangements to obtain a ride to and from the employment site.

4. Since the Court released him on March 26, 2021, Mr. Crowl has complied with all the conditions of release.

5. Mr. Crowl needs to work and earn income to contribute to his room and board and other living expenses, which to date have been supplied by his son. He does not have retirement income or other benefits or outside income. He also needs employment income to pay for travel to receive medical care at the VA Hospital.<sup>2</sup>

6. As noted above, the Government has informed undersigned counsel that it does not object to the Modification but will file a written response.

7. The Pretrial Services Officers supervising Mr. Crowl in the Southern District of Ohio and in the District of Columbia do not oppose the modification.

8. All other conditions of pretrial release shall remain in place.

WHEREFORE, Mr. Crowl respectfully requests that this Honorable Court modify the conditions of his pretrial release to allow for work release as outlined above.

Respectfully submitted,

/s/ Carmen D. Hernandez

**Carmen D. Hernandez**

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<sup>2</sup> When Mr. Crowl last received medical care for melanoma, he had to travel to an out-of-state VA Hospital. In recent weeks, he has been in contact with the VA to secure a medical appointment.

**CERTIFICATE OF SERVICE**

I hereby certify that the instant Motion was served on all counsel of record 17<sup>th</sup> day of May, 2021 on all counsel of record via ECF.

*/s/ Carmen D. Hernandez* \_\_\_\_\_

**Carmen D. Hernandez**

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**ORDER**

Upon consideration of the Motion to Modify Conditions of Pretrial Release, filed by Donovan Crawl and any response filed by the United States, good cause having been shown, it is this \_\_\_\_\_ day of May, 2021, by the United States District Court for the District of Columbia,

**ORDERED:**

1. That the Motion is hereby **GRANTED**;
2. That Mr. Crawl is hereby **AUTHORIZED** to leave his home for employment purposes, with additional travel time to and from work, with advance notice to Pretrial Services; and
3. That all others Conditions of Release shall remain in place.

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**HONORABLE AMIT P. MEHTA  
UNITED STATES DISTRICT JUDGE**