

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

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 21-cr-00292-RCL
)	
CHRISTOPHER WORRELL, et. al.,)	
)	
Defendant)	
)	

**DEFENDANT CHRISTOPHER WORRELL'S MOTION TO MODIFY
CONDITIONS OF PRETRIAL RELEASE**

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Attorney for Defendant

NOW comes Defendant Christopher Worrell by and through his counsel of record, William L. Shipley, Esq., respectfully files this motion to modify his conditions of pretrial release.

Defendant Worrell was release from Department of Corrections, Correction Treatment Facility (“DOC CTF”) on November 4, 2021. On August 19, 2022, at the request of Government this Court modified Defendant Worrell’s conditions of release to only allow Defendant Worrell to leave his home for medical or religious purposes.

Since such conditions have been put in place, Defendant Worrell has had continued difficulty with his health. As such, Defendant Worrell doctor, Dr. George Rucker believes he will benefit from sunlight and vitamin D exposure. *See* EFC. No. 188 noting the following:

Further detail: Patient is unable to exercise or even get much sunlight/vitamin D exposure. This is detrimental to a cancer survivor and cancer patient. I would suggest the court modify his conditions of release to allow for exercise, fresh air, and meet with his peers. As an experienced M.D. and surgeon I see no characteristics emotionally or psychologically that pose any type of risk or threat to his fellow community members.

Due to this, undersigned conferred with Government counsel, William Dreher ahead of this filing in an effort relax conditions for Defendant Worrell to allow for the above recommendation from Dr. Rucker.

As such, Defendant Worrell requests this Court to modify his conditions of release as followed:

1. During the hours of 8:00 a.m. to 8:00 p.m., Defendant Worrell shall be allowed to travel no more than 15 miles from his place of residence without the permission of pretrial services of the court.

Defendant Worrell makes such request to have access to parks and recreational areas near his home and those that are near his church. Further, there are several rehabilitation facilities within the requested allowed area Defendant Worrell believes would be beneficial to access.

Undersigned has conferred with Government counsel, William Dreher, regarding the request. As presented to undersigned counsel, the government does not intend to oppose such motion, rather they will file separate and defer to pretrial services on the ability to accommodate the request.

Dated: January 14, 2023

Respectfully submitted,

/s/ William L. Shipley
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