

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

UNITED STATES OF AMERICA,	:	
	:	
v.	:	Case No. 1:21-CR-00447-CJN-03
	:	
JOSHUA CHRISTOPHER DOOLIN,	:	
Defendant.	:	

MOTION FOR MODIFICATION OF CONDITIONS OF RELEASE

COMES NOW, Joshua Christopher Doolin, through counsel, Allen H. Orenberg, to respectfully request this honorable court to modify his conditions of release by the vacating requirement of “Stand Alone Monitoring” (GPS ankle bracelet) *See* Order Setting Conditions of Release. (Doc. 22, pp.2-3)

As grounds for this motion counsel states the following:

1. Mr. Doolin is charged with violations of 18 U.S.C. § 1752(a)(1) - Knowingly Entering or Remaining in any Restricted Building or Grounds Without Lawful Authority (Count 16), and 18 U.S.C. §1752(a)(2) – Disorderly and Disruptive Conduct in a Restricted Building. (Count 17)
2. Both charges are misdemeanors.
3. None of the charges allege acts of violence by Mr. Doolin.
4. Nothing in the discovery provided to date contains any indicia of violence by Mr. Doolin.
5. The Bail Reform Act, 18 U.S.C. §3142(c)(1)(B) provides for release of a person on conditions subject to the:

least restrictive further condition, or combination of conditions, that such judicial officer determines will reasonably assure the appearance of the person as required and the safety of any other person and the community, which may (emphasis provided) include the condition that the person—

6. Mr. Doolin’s placement on “Stand Alone Monitoring” (GPS ankle bracelet) is not the “least restrictive” condition of release.

7. Since the Court released Mr. Doolin on July 8, 2021, (with the condition of “Stand Alone Monitoring” (GPS ankle bracelet)), he continues to live with his wife in his home community of Polk City, Florida. Counsel believes he is in full compliance with all terms and conditions set forth in the Order Setting Conditions of Release. (Doc. 22) ¹

8. Prior to January 6, 2021, Mr. Doolin was a firefighter/EMT in Polk City, Florida. Since January 6, 2001, he has been employed full-time with a local bread delivery company. *See* letter from Aldon Haskaj, attached as an exhibit. Furthermore, he possesses an excellent reputation in his community for being a good family man, devoted to his faith, hardworking, and for being a contributing member of his community. *See* letters from Pastor Kyle Ivy, Jimmy Wilson, Morgan Doolin (wife), Jan Doolin (mother), Sam Doolin (brother). All letters are attached as an exhibit.

¹ On July 29, 2021, counsel requested U.S. Pre-Trial Services to provide a compliance status update as to Mr. Doolin – which has not yet been produced.

9. Mr. Doolin is not charged with a crime of violence or a felony, therefore, “Stand Alone Monitoring” (GPS ankle bracelet) is not necessary to “reasonably assure the appearance of the person as required and the safety of any other person and the community.”

WHEREFORE, for these reasons and such other reasons that may appear just and proper, counsel respectfully requests that this motion to modify conditions of release be granted.

Respectfully Submitted,

_____-S-_____
Allen H. Orenberg, # 395519
The Orenberg Law Firm, P.C.
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Potomac, Maryland 20854
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CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of July, 2021, a copy of the foregoing Motion For Modification Of Conditions Of Release, with a proposed Order, was delivered to case registered parties by the CM/ECF court system.

_____-S-_____
Allen H. Orenberg

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

UNITED STATES OF AMERICA,	:	
	:	
v.	:	Case No. 1:21-CR-00447-CJN-03
	:	
JOSHUA CHRISTOPHER DOOLIN,	:	
Defendant.	:	

ORDER

This matter is before the Court on the defendant's motion to modify his conditions of release to vacate the requirement of "Stand Alone Monitoring" (GPS ankle bracelet), and the court having considered the motion and the government's response thereto, it is this _____ day of _____ 2021,

ORDERED that the defendant's motion should be and hereby is GRANTED. The requirement of "Stand Alone Monitoring" (GPS ankle bracelet) is vacated. All other conditions of release remain in place.

SO ORDERED.

United States District Judge

Copies To:

1. All case registered parties
2. U.S. Pre-Trial Services Agency

Tampa Bread, LLC
4616 Dillwyn Dr.
Lakeland FL 33813

To:

Honorable Carl J. Nichols

United States District Judge

United States Courthouse

333 Constitution Avenue, N.W

Washington D.C. 20001

RE: Case No. 21-cr-00447-CJN-03

USA v. Joshua C. Doolin

Dear Honorable Judge Nichols

My name is Aldon Haskaj. I own a local small business here in Lakeland, FL. We operate a bread delivery route in the Tampa Bay area. Our company is called Tampa Bread.

I have known Josh a little over a year, since he was in Firefighting School, meeting him through my sister-in-law. He's an extremely honest and bright young man, with a lot of drive and a strong dedication to his faith. He is also an excellent husband (recently getting married) and looking forward to having children and growing his family.

I remember telling my wife I wish I could find employees like him. I reached out to Mr. Doolin for employment after hearing he was looking and he was ready to join the team. We operate the route 3 times a week, Monday, Wednesday and Friday, and usually work from midnight till about noon. Mr. Doolin will be mostly working in the Pinellas/Pasco Counties but will also be doing sales closer to home, in Polk County, on his days off. He has been a great addition to our small crew and has caught on to the nature of the work quickly. I hope to have him for years to come but I understand his dream job is and will always be a firefighter/EMT and I will gladly recommend him for when that time comes once again.

I ask that you treat this young man with some leniency,

Dated this Monday, July 26th, 2021

Aldon Haskaj

Tampa Bread, LLC

Lakeland FL



Cleveland Heights BAPTIST CHURCH

A Heart for Lakeland, A Vision for the World

July 24, 2021

Honorable Carl J. Nichols
United States District Judge
United States Courthouse
333 Constitution Avenue, N.W.
Washington D.C. 20001

RE: Case No. 21-cr-00447-CJN-03
USA v. Joshua C. Doolin

Dear Honorable Judge Nichols,

My name is Michael Kyle Ivey, I am the pastor of Cleveland Heights Baptist Church in Lakeland, FL. I have come to know Joshua Doolin from his attending the church. I have personally known him now for about seven years. When he started attending church at Cleveland Heights Baptist I was the youth pastor and he was a member of my youth group. He attended our youth camps and was involved in our church events and fundraisers. He has even spoken publicly and given testimony of his faith. He also has been on a church group mission trip to Guyana to help and serve in our missionary's church.

Josh is dependable, faithful, and helpful to our church and community. He has a caring, loving, and compassionate heart for others. He is important to me and our church family at Cleveland Heights Baptist Church. As I have watched him mature into a young man, he has shown responsibility, determination, and strength in setting and achieving goals in life. I have always known him to work and keep a job in order to provide for himself financially. Even through school and work, Josh would still find time for church and often give praise to the Lord publicly for how good He has been to him.

It is my belief that Josh Doolin can and will do great things for his family, community, and the Lord. I believe that he deserves the opportunity to redeem himself and show society and the Lord what he can truly accomplish in life. I ask for mercy and compassion upon him, and that the God of heaven will give you all wisdom and understanding needed in all that you preside over. May God bless you and your family. Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kyle Ivey', with a long, sweeping flourish extending to the right.

Kyle Ivey
Senior Pastor

smi

RE: Support Letters on Behalf of Joshua C Doolin.
US District Judge Carl J. Nichols
Case No. 21-cr-0047-CJN-03
US District Court for the District of Columbia

Dear Honorable Judge Nichols,

I am writing this letter to you on behalf of my dear husband Joshua Christopher. My name is Morgan Murdock Doolin. Josh and I have been together for close to 4 years and we were married in the state of Florida just a few short months ago. Never have I loved someone so much. He is a wonderful man and husband. My husband is a strong Christian and has been very influential in my life by encouraging me to do what is right and to live a life worth pleasing God. He has been my best friend when anyone else would have walked away. He is faithful, patient, kind-hearted, and godly. He teaches me daily to be more aware of others around me by his own character. He is always stopping to help someone and is the first to volunteer. We once went to Savannah, Georgia and as we were walking he noticed a man working on a broken down car while I kept walking on. He stopped to help that man get his car going again. He is so self-less. My husband is a hard worker. Next to my dad and grandpas, I don't think I've ever seen anyone work as hard as Josh. He finishes everything he sets out to do and does it right. Every job he has ever worked at would give him nothing but praise for his dedication and impeccable character. Whether it's sweating in the Florida heat, or performing CPR on a patient, my husband gives his work his all. He decided two years ago that he wanted to be a firefighter. He wanted to help others and be a part of an awesome team. Everyone told me right away, "Josh is going to make such a wonderful fireman. He is so good with people." And I also knew he would be the best. He sacrificed to go to EMT school and graduated in the top percentile in his class. He was awarded a scholarship by the Noah's Army Foundation (A local organization that pays for young people of good character to go to fire or police academy) to go to fire academy. I was so proud of him. He spent those months training, studying, and giving it his all. He broke records in fire academy and graduated top of his class. After graduation, Joshua was hired at Polk County Fire Rescue. He was so happy. Joshua absolutely loved being a fireman. He loved his job. It gave him a real sense of accomplishment and joy. In the first few weeks of training all the recruits were put to the test- my Josh broke county training records once more. I was beyond proud. Captains and Battalion Chiefs would pull him aside and commend him. He told me how the chief told him, "You're going to be a Captain one day. I see it. I can already tell what kind of a man you are and know you are going to go far with his department." Josh was terminated immediately on the day of his arrest. It broke his heart but we know all things work together for good and hold on to the truth that the Lord has a plan, a will, and a way. (Romans 8:28). I could spend hours telling stories of my husband's character but I will conclude this letter with telling you of my husband's patriotism. We both were raised by our parents with a huge love for this country and the principles upon which this nation was founded. I knew as an American history fanatic and deep patriot, I could never marry someone less patriotic as myself and with Josh, I wouldn't need to worry about that. He is just as strong a patriot as I am. Coming from a military family, I was taught the history of this country and loved to learn more and more about this republic blessed by God. Joshua loves his country as I do. We love the

sacred principles it was founded upon by our forefathers and the symbol of what our country stands for and the beacon of hope it was to the world.

I pray for your protection Honorable Judge Nichols, and thank you for considering all this. Thank you for your time. God Bless.

Sincerely,
Morgan Doolin.

RE: Support Letters on Behalf of Joshua C Doolin.
US District JUDGE Carl J. Nichols
Case No. 21-cr-0047-CJN-03
US District Court for the District of Columbia

Dear Honorable Judge Nichols,

My name is Jan Doolin, Joshua C Doolin's mother. My family has been upstanding members of the Lakeland community for three generations. I wanted to offer a letter of recommendation and appeal on behalf of my son. Please consider the following case for leniency.

Joshua is a good husband, son, brother and uncle. He has a deep commitment to his family and values being close to them both emotionally and geographically. He has been married to his sweet wife for less than 5 months, and is the primary breadwinner for his household. Providing financial stability for his family is very important to him.

Joshua has 4 sisters and 2 brothers, with all but one residing in Lakeland. One brother is in the army, training as an Army ranger in Washington state. Joshua has 10 Nieces and nephews that adore him. He is the favorite uncle and is at every game, birthday party and other milestones. Joshua is very active in his church and community and is a man of faith and good standing. He loves people and is very giving, kind, honest and thoughtful. Many people have reached out to me with praise of his work ethic and outstanding character. He is the one that you find on the side of the road in the rain, helping someone who is broken down.

I took care of my little 95 year old momma for the last year of her life. Joshua was there too, helping me. He would lift my momma and carry her where she needed to go. He helped to make it possible for her to pass away peacefully in her childhood home with her family by her side. Joshua was arrested on my birthday. Late that afternoon, when he got out on bail, the first thing that he said was, "I'm sorry momma. Happy birthday, sweet little momma. I didn't forget your birthday. I love you."

Joshua had just been hired on with our local fire department, and as a fireman he had already broken many records and was at the top of his class.

Thank you for taking all of this into consideration.

Sincerely,

Jan Doolin

Dear Honorable Judge Nicholas,

The Year of
our Lord,
26 Jul 2021

I He had worked Two years to get on
with the Fire Department as an EMT,
He had only been married for about a month
and had finally gotten the Job for 3 weeks
and was heavily relying on it, when he was
arrested and Fired, But even in the face of all
that he was kind and cheerful knowing God will
provide and is being Diligent to take care of
his new Bride,

I could go on forever but I believe I have
made it clear about my view of his character.
I will do I need to support and help Joshua,
If it were possible I would take his place.

Thank you for taking the time to read this,
and Trust God will work it all out for good through
your hands.

To the Honorable Judge Nicholas,
Thank you, and have a blessed Day,

Signed

Samuel Timothy Doolin.

Dear Honorable Judge Nicholas,

It wouldn't Be an exaggeration to say he is a cheerful giver, he holds nothing back when it comes to helping others in need or just trying to bless others, Be it with his time, energy or finances, even in his lack of times of need he did not spare or hold back from others.

As For diligence, he has always been able to find work and he has succeeded in just about everything he has put his hands and mind to, he has succeeded in a wide scope of jobs and activities from hard labor some tasks to things more academic. none of this is meant to inflate his achievement as if they mean anything, but to point out his work ethic which far ~~exceed~~ exceeds my own.

As for his attitude and devotion to God, the same as with all other things, he is cheerful and diligent, he has worked hard to make sure he pleased the Lord with his relationship with his now wife, he has really grown in his relationship with Jesus Christ over these past few years. But ever the more so this year, seeking wise council and Godly friends and influences and digging into God's Word,

Honorable Carl J. Nicholas
United States District Judge
United States Courthouse
333 Constitution Avenue, N.W.
Washington D.C. 20001

In the year of our Lord
Jesus Christ, 26-Jul-2021

Samuel Timothy Doolin
275 RGR RGT
BLDG 3501 EST
JBLM, WA 98433

RE: Case No. 21-cr-00447-CJN-03
USA v. Joshua C. Doolin

Dear Honorable Judge Nicholas,

My name is Samuel Timothy Doolin.
I am a US Army Ranger in the 2nd Battalion 75th
Ranger Regiment.
I am Joshua C. Doolin's Older Brother.
I have known him all of his life and we grew
up together and spent most of our time together.

In relation to my assessment of Joshua C. Doolin's
character, Past and Present, He has always been a
kind, considerate and diligent person, who loves the Lord
and people. I have never known him to be lazy.

To Honorable Judge Carl J. Nichols
United States District Judge
United States Courthouse
333: Constitution AVE N.W.,
Washington D.C. 20001
RE: Case No. 21-cr-00447-JCN-03
USA vs Joshua C. Doolin

Dear Honorable Judge Nichos,

My name is Jimmy Wilson I am a Broker for Bullfrog and Dog Realty. Joshua has worked for me for many years. I brought him on my team because I knew so much about him. His Father Frank and I have been friends all our lives. I watched Joshua grow up. He has been involved in Church all of his life. We have hunted and fished together since he was a small child. This is why I can say he can be trusted to show and complete anything he starts. Joshua works more then one job at a time. He is newly married, just starting off on his own family. You can not ask for a better employee or friend. I feel he completely trustworthy and faithful.

--

We appreciate the opportunity to work with you!

Sincerely,



Jimmy L. Wilson, Broker
Bullfrog and Dog Realty Inc.
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305.896.8137 Cell
863.875.6616 Fax

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the 1990s, the number of people in the world who are undernourished has declined from 760 million to 600 million. The number of people who are malnourished has declined from 1.1 billion to 800 million. The number of people who are obese has increased from 100 million to 300 million. The number of people who are overweight has increased from 100 million to 300 million. The number of people who are obese and overweight has increased from 100 million to 300 million. The number of people who are obese and overweight has increased from 100 million to 300 million.