IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	*	
	*	
vs.	*	**Case No. 1:21-cr-00028-APM-2**
	*	
DONOVAN CROWL	*	
Defendant	*	
	*	

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CONSENT MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE TO AUTHORIZE TRAVEL OUTSIDE THE SOUTHERN DISTRICT OF OHIO

Donovan Crowl, by his undersigned counsel, respectfully requests that this Honorable Court modify its Order Setting Conditions of Pretrial Release to authorize Mr. Crowl to travel outside the Southern District of Ohio to the adjacent Northern District of Ohio for employment purposes. AUSA Kathryn Rakoczy consents to this request. Pretrial Services Officer Masharia Holman consents to this request.

1. On May 19, 2021, this Court modified Mr. Crowl's conditions of release to authorize him to leave his home to engage in employment (ECF 191).

2. Since that time, Mr. Crowl has been employed at various locations doing construction-related work.

3. Mr. Crowl, who lives in the Southern District of Ohio has now obtained employment at a location approximately 20 minutes from his residence, which is located in the Northern District of Ohio.

4. The original Conditions of Pretrial Release entered by this Court require that Mr. Crowl remain within the Southern District of Ohio. *See* Condition 7(f) (ECF 115).

5. The relevant information relating to the job, including the name and contact information of the employer and the location of the employment site has been provided to AUSA Rakoczy and to the Pretrial Services Officers in the District of Columbia and in Ohio.

6. All other conditions of pretrial release 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 to the Northern District of Ohio for employment purposes.

Respectfully submitted,

/s/ Carmen D. Hernandez

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CERTIFICATE OF SERVICE

I hereby certify that the instant notice was served on all counsel of record this 20th day of October, 2021 on all counsel of record via ECF.

/s/ Carmen D. Hernandez

Carmen D. Hernandez