

**UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

Plaintiff,

vs.

CR. NO. 22-cr-00170

HONORABLE Colleen Kollar-Kotelly

TREVOR BROWN,

Defendant.

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**COMBINED MOTION AND BRIEF FOR
MODIFICATION OF BOND CONDITONS**

Trevor Brown was granted bond on November 22, 2022. He was placed on Home Detention, which is defined in his conditions of release as a restriction to his residence “except for employment; education; religious services; medical, substance abuse, or mental health treatment; attorney visits; court appearances; court-ordered obligations; or other activities approved in advance by the pretrial services office or supervising officer.” See Case 22-cr-00170, Doc. 60, p. 2.

According to his pretrial officer in the Eastern District of Michigan, Jessica Homann, Mr. Brown is “doing excellent” in following his bond conditions, including mental health treatment. Officer Homann has approved “other activities” pursuant to the home detention order. Additionally, Brown’s mental health team

has encouraged him to engage in “pro-social” activities to supplement his treatment. For instance, Mr. Brown has obtained employment at Bazzi Tires & Wheels in Detroit. He would also like to visit his brother at his residence just blocks away from his mother’s residence. Lastly, he would like approval to go to the gym, which is highly encouraged for physical and mental wellness.

His mother, Dawn Herrick, is currently Brown’s third-party custodian. However, Officer Homann recently informed counsel that Pretrial Services in the District of Columbia requires the third-party custodian to “accompany” the defendant to any “other activities approved by Pretrial Services” under a “home detention” order. Under this interpretation, Ms. Herrick would have to accompany Brown to work, to the gym, and to his brother’s residence, which is simply not feasible given Herrick’s other responsibilities.

Given how well Mr. Brown has been doing since his November release, counsel respectfully requests this Honorable Court to remove the third-party custodian and impose a “curfew” that would allow for his employment, exercise, and visits at his brother’s home. Or in the alternative, modify his conditions of home detention to allow Brown to participate in these “pro-social” activities (as described by his mental health team) without the presence of his mother.

Pretrial Services in the Eastern District of Michigan recommends and concurs in these modifications. Pretrial Services in the District of Columbia says it will defer to the Court's decision. The Government has been notified of this Motion but had not responded as to concurrence at the time of this filing.

CONCLUSION

Based on the foregoing, counsel for Mr. Brown respectfully requests this Honorable Court to remove the third-party custodian and impose a "curfew" that would allow for his employment, exercise, and visits at his brother's home. Or in the alternative, modify his conditions of home detention to allow Brown to participate in these "pro-social" activities (as described by his mental health team) without the presence of his mother.

Respectfully submitted,

FEDERAL COMMUNITY DEFENDER

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Dated: January 31, 2023

CERTIFICATE OF SERVICE

I, hereby certify that on January 31, 2023, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

Craig Estes
Assistant United States Attorney
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