

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

MATTHEW THOMAS KROL,

Defendant.

Case No. 1:22-CR-00110-RC

Hon. Rudolph Contreras

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DEFENDANT'S SUPPLEMENT TO HIS MOTION TO REVOKE DETENTION ORDER

NOW COMES, Matthew Thomas Krol, by and through his Attorney Michael J Cronkright, and states in support of Defendant's Motion to Revoke Detention Order:

This Court requested Defense Counsel supplement Mr. Krol's Motion to Revoke Detention Order with relevant records regarding Mr. Krol being found face down and unresponsive in his jail cell.

On April 20th, 2022, Mr. Krol was found laying face down on the floor of his cell. Ten officers, two licensed practical nurses (LPN), and one EMT were involved in the incident and four of the incident reports are attached.

Lieutenant J. Bickel wrote:

"On the above date and approximate time, I responded to a medical emergency in C-Block. When I arrived, Inmate Krol was laying face down on the floor of his

cell. I opened the cell door and stepped in to roll Inmate Krol to his side. When I rolled Inmate Krol to his side, he sat up and started yelling and cursing at me. I then told Inmate Krol to calm down and tell me what happened. Inmate Krol started talking about his Life Vest alarm was going off then he fell. Officer Carl and I then assisted Inmate Krol to his feet and out of the cell. Medical was waiting and gave him a quick check over. Sergeant Davis and I then assisted Inmate Krol down the stairs and into a wheelchair. Inmate Krol was then escorted to Booking to be further assessed. LPN Nash informed me that Inmate Krol needed to be transported to CRH via EMS. I then got Ofc. Davis and Ofc. Hurlock ready for the transport.” (Exhibit A)

Sergeant T. Davis wrote:

“On the above date and approximate time, I responded to a Medical Emergency in C-Block. When I arrived, I noticed Lt. Bickel in Inmate Krol’s cell. I went to Inmate Krol’s cell with the other responding staff to see what was going on. Lieutenant Bickel and Ofc. Carl assisted Inmate Krol to his feet. Lieutenant Bickel and I assisted Inmate Krol downstairs and into a wheelchair. Medical Staff arrived and assessed the situation. Inmate Krol was then escorted to Booking. Medica staff informed Lt. Bickel and I that Inmate Krol would be going to the hospital.” (Exhibit B)

Officer P. Gordon wrote:

“On the above date and approximate time I responded to a Medical Emergency call for C-Block. Upon my arrival I saw Inmate Krol laying on floor when Lt.

Bickel and Ofc. Carl assisted him up. Sgt. Davis then took over from Officer Carl. Lt. Bickel told me I can resume my post duties.” (Exhibit C)

Licensed Practical Nurse V. Nash wrote:

“On the above date and approximate time, Medical Emergency called to C-Block where Inmate Krol was observed on cell floor and was determined as A&O x 3 at time of arrival less than one minute from the call. Inmate Krol began to become agitated with Security and Medical staff when being assisted up and out of his cell. He complained of dizziness spell and stated he fell forward when waving for help. Slight abrasion to left side of his forehead with no discoloration or bleeding noted. When asked if he had lost any consciousness he stated he could not honestly tell me. Stated complaints of a pounding headache and seeing light flashes prior to his LifeVest defibrillator alarm going off and denied feeling any shock from machine. Following incident he was transported via wheelchair to Booking where vital signs were obtained and were within normal limits. On-call was notified and gave verbal order to send Inmate Krol to the ER for further evaluation via EMS. Informed Shift Supervisor Lt. Bickel, J. to which he immediately prepped Officers for transport.” (Exhibit D)

Defendant would further assert that the reports cited do not adequately account for the significant delay in obtaining help at the outset. The reports attached indicate the rapid response of the officers *once summoned*. The delay in the summon was nonetheless significant and potentially life threatening. This illustrates the difficulty discussed

previously: that the medical care is exemplary once the Defendant gets to the hospital. Thus, the assertion continues to be the delays in obtaining emergency care would be minimize if he were confined at home.

Respectfully submitted:

A handwritten signature in blue ink, appearing to read "M Cronkright".

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