

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

UNITED STATES OF AMERICA

V.

DONOVAN CROWL, et al

Defendant

Case No. 21-cr-00028-APM

**DEFENDANT MICHAEL GREENE'S MOTION TO
MODIFY CONDITIONS OF RELEASE**

William L. Shipley
PO Box 745
Kailua, Hawaii 96734
Tel: (808) 228-1341
Email: 808Shipleylaw@gmail.com
Attorney for Defendant

NOW COMES Defendant Michael Greene by and through his counsel of record, William L. Shipley and Britt Redden, and respectfully request this Honorable Court to modify his conditions of release pending sentencing.

On March 21 2023, Defendant Greene was found not guilty by a jury of Count 1 “Conspiracy to Obstruct an Official Proceeding,” Count 3 “Conspiracy to Prevent Members of Congress from Discharging Their Duties,” and Count 9 “Tampering with Documents or Proceedings.” *See* EFC No. 910. Defendant Greene was found guilty by a jury of Count 5 “Entering or Remaining Restricted Building or Grounds.” *See* *Id.*

The jury was unable to reach a verdict on Count 2 Obstruction of an Official Proceeding. *See* *Id.*

During the Status Conference on March 31, 2023, the Government advised the Court that it would not seek to retry Greene on Count 2, “Obstruction of an Official Proceeding.”

On June 30, 2022, this Court then entered an order setting Defendant Greene’s condition of pretrial release. As part of the conditions, this Court ordered Defendant Greene to “not possess a firearm.” *See* EFC No. 701. Further, this Court ordered Defendant Greene to “not obtain a passport or other international travel document.” *See* *Id.* Thus, Defendant Greene surrendered his passport to the United States Probation Office.

Defendant Greene now moves this Court to remove both of these restrictions and lift any travel restrictions both domestic and international as Defendant Greene’s employment can involve international travel.

Defendant Green's profession in the field of security, as testified to by him at trial, requires as part of his job that he possess and be proficient with a firearm. Defendant Greene needs to update his firearms certification documents for various employment opportunities and cannot do so with the restrictions now in place.

Further, in connection with his job, Defendant Greene requires his passport to travel abroad. Such travel will only be done with advance approval by Pretrial Services and this Honorable Court.

Wherefore, Defendant Greene respectfully requests this Honorable Court to amend its June 30, 2022, order setting Defendant Greene's conditions of release by remove the restrictions related to possessing a firearm, and with regard to his ability to travel aboard in connection with his employment.

Dated: April 1, 2023

Respectfully Submitted,

/s/ William L. Shipley
William L. Shipley, Jr., Esq.
PO BOX 745
Kailua, Hawaii 96734
Tel: (808) 228-1341
Email: 808Shipleylaw@gmail.com

Attorney for Defendant