

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

UNITED STATES OF AMERICA

v.

DONOVAN CROWL,

Defendant.

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Case No. 21-CR-28 (APM)

**GOVERNMENT’S RESPONSE TO MOTION TO MODIFY CONDITIONS OF
RELEASE**

The United States respectfully files this response to the Defendant Donovan Crowl’s Motion to Modify Conditions of Release. (ECF No. 189).

While the government maintains that Defendant Crowl presents a danger to the community for all the reasons previously stated on the record, the government acknowledges that, under the circumstances, there is a legitimate countervailing benefit to the defendant maintaining gainful employment if not incarcerated—on the condition that his employment can be properly monitored the by the Pretrial Services Agency (“PSA”). Because the government understands that Defendant Crowl has been compliant with his conditions of release to date, he has provided a detailed plan of employment to PSA, and PSA does not object to monitoring this employment plan, the government does not oppose the defendant’s request. The government would note, however, that PSA suggested that the Court needs to step down the defendant’s level of supervision from Home Incarceration to Home Confinement in order for it to be permissible for the defendant to leave his home for work.

WHEREFORE, the government does not oppose the Defendant Crowl's motion to modify his conditions of release.

Respectfully submitted,

CHANNING D. PHILLIPS
ACTING UNITED STATES ATTORNEY



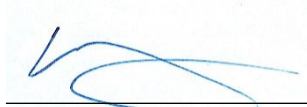
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CERTIFICATE OF SERVICE

I hereby certify that on May 18, 2021, I sent a copy of the foregoing via the Court's electronic filing system to Carmen Hernandez, Esq., counsel for the defendant.



KATHRYN L. RAKOCZY

Special Assistant United States Attorney