UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

UNITED STATES OF AMERICA

v. **Case No. 3:24-cr-179-WWB-LLL**

CRYSTAL DENEAN HARVELL
_____/

UNOPPOSED MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE – TRAVEL OUTSIDE OF THE MIDDLE DISTRICT OF FLORIDA

Defendant, **Crystal Denean Harvell**, by and through undersigned counsel, hereby moves this Court to modify the conditions of her pretrial release and allow her to travel outside the Middle District of Florida from October 17, 2024, through October 20, 2024. In support of this Motion, Ms. Harvell states the following:

1. On September 4, 2024, Ms. Harvell appeared in the Middle District of Florida for an initial appearance and was released on standard and special conditions of pretrial release, which are listed in the Order Setting Conditions of Release (Doc. 10).
2. Paragraph (9)(D) of the original Order states that Ms. Harvell's "…travel is restricted to the Middle District of Florida" (Doc. 10).
3. Ms. Harvell has indicated that she would like to visit her daughter who is in college at Albany State University in Albany, Georgia, and attend her

homecoming events. Ms. Harvell is planning on staying with her daughter at the University Apartments, 400 Radium Springs Road, Apartment 3102, Albany, Georgia 3102. She would like to travel to Albany, Georgia on October 17, 2024, and return to the Middle District of Florida on October 20, 2024.

4. Ms. Harvell requests that Specific Condition (9)(D) of the Special Conditions be modified to allow her to travel outside the Middle District of Florida from October 17, 2024 through October 20, 2024, for the purpose of visiting her daughter in Albany, Georgia, which is in the Middle District of Georgia.
5. Pretrial Services Officer Kimberly Barrett has been contacted and has no objections to Ms. Harvell traveling to visit her daughter in college.
6. Undersigned counsel discussed this matter with Assistant United States Attorney Kevin Frein, and he has no objection to this Motion.
7. Therefore, Ms. Harvell respectfully requests that this Court issue an order modifying the travel restrictions set forth in the Order Setting Conditions of Release.

MEMORANDUM OF LAW

This Court has numerous options in setting conditions of pretrial release that "will reasonably assure the appearance of the person as required and the safety of any other person and the community." 18 U.S.C. § 3142(c)(1)(B). This Court "may at any time amend the order to impose additional or different conditions of

release." 18 U.S.C. § 3142(c)(3).

A. FITZGERALD HALL, ESQ.
FEDERAL DEFENDER, MDFL

s/ Sabra M. Barnett
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by electronic notification to the Office of the United States Attorney, 300 N. Hogan St, Suite 700, Jacksonville, Florida 32202, this 12th day of September 2024.

s/ Sabra M. Barnett
Sabra M. Barnett, Esq.
Assistant Federal Defender