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 WITH PERMISSION BY PRETRIAL SERVICES

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 with permission by her Pretrial Services Officer. 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 had discussions with her Pretrial Services Officer and undersigned counsel regarding her desire to be able to travel to Atlanta for

work prospects and to Albany, Georgia, to spend time with her daughter.

4. Ms. Harvell requests that Specific Condition (9)(D) of the Special Conditions be modified to continue to restrict her travel to the Middle District of Florida but allow for that travel restriction to be modified by the Pretrial Services Officer. This modification would allow Ms. Harvell to travel outside the Middle District with permission from her Pretrial Services Officer and without intervention of the Court each time she would like to travel to Georgia.
5. Pretrial Services Officer Kimberly Barrett has been contacted and has no objections to the modification request, specifically she has no objections to the specific conditions being modified to allow Ms. Harvell's travel to be modified by the Pretrial Services Officer.
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 13th day of November 2024.

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