IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA	*	
v.	*	Case No. RDB-23-27
KEVIN DAVIS	*	

* * * * * * * * * * *

CONSENT MOTION TO MODIFY CONDITIONS OF RELEASE

Kevin Davis, through his attorney, C. Justin Brown, Brown Law, respectfully requests that this Honorable Court modify the conditions of his pretrial release. Specifically, Davis seeks to change condition (8)(s) of his release ("location restriction programs") from "home confinement" to "curfew" in order to allow him greater flexibility to work and help care for his children. In support of this Motion, Davis states the following:

1. On January 6, 2023, this Court ordered Davis's pretrial release on home confinement with location monitoring. *See* ECF 11 at 2 (Order Setting Conditions of Release). This condition prohibits Davis from leaving his residence except for employment, medical necessities, attorney visits, court appearances, or other activities approved by the Court or Pretrial Services. *Id.*

2. Davis seeks to be taken off home confinement and placed on a curfew requiring him to be home between 9 p.m. and 7 a.m., or as directed by Pretrial Services.

3. To date Davis has been largely compliant with the terms of his release. He has accrued a small number of minor violations: a couple for returning home from work

late, and a couple for consuming THC edibles. However, he is now undergoing outpatient drug treatment, and by all indications he has been doing well in recent months.

4. A curfew would allow Davis to better support his children. His two high-school-aged children are involved in numerous extracurricular activities, and they depend on Davis to take them to their activities after school and on the weekends. They also depend on him to drive them to school on the mornings when they are staying with him.

5. Additionally, a curfew will also provide needed flexibility for Davis's work schedule. Davis is employed at Brothers Collision body shop. While his manager does not require him to work rigid hours – so he can come and go when he needs to take his children to places – the freedom with his work schedule is only so helpful so long as he is required to obtain permission before leaving his home.

6. Other than permitting Davis to be on a curfew, all other terms of pretrial release would remain the same.

7. Undersigned counsel has spoken with Davis's Pretrial Services Officer, Nicholas Luko, and he consents to this request. Assistant U.S. Attorney Paul Riley also has no objection to this request.

WHEREFORE, Defendant Kevin Davis respectfully requests that this Court grant his motion and modify his conditions of release to place him on a curfew instead of home confinement.

Respectfully Submitted,

_____/s/_____

C. Justin Brown
BROWN LAW
1 North Charles Street, Suite 1301
Baltimore, MD 21201
Tel: 410-244-5444
Fax: 410-934-3208
brown@cjbrownlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on October 11, 2023, a copy of this Motion was served on all parties via CM/ECF.

_____/s/_____
C. Justin Brown