

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	:
	:
v.	: Case No. 1:21-CR-00447-CJN-03
	:
JOSHUA CHRISTOPHER DOOLIN,	:
Defendant.	:

**MOTION FOR MODIFICATION OF CONDITIONS OF RELEASE**

COMES NOW, Joshua Christopher Doolin, through counsel, Allen H. Orenberg, to respectfully request this honorable court to modify his conditions of release by the vacating requirement of “Stand Alone Monitoring” (GPS ankle bracelet) *See* Order Setting Conditions of Release. (Doc. 22, pp.2-3)

As grounds for this motion counsel states the following:

1. Mr. Doolin is charged with violations of 18 U.S.C. § 1752(a)(1) - Knowingly Entering or Remaining in any Restricted Building or Grounds Without Lawful Authority (Count 16), and 18 U.S.C. §1752(a)(2) – Disorderly and Disruptive Conduct in a Restricted Building. (Count 17)
2. Both charges are misdemeanors.
3. None of the charges allege acts of violence by Mr. Doolin.
4. Nothing in the discovery provided to date contains any indicia of violence by Mr. Doolin.
5. The Bail Reform Act, 18 U.S.C. §3142(c)(1)(B) provides for release of a person on conditions subject to the:

least restrictive further condition, or combination of conditions, that such judicial officer determines will reasonably assure the appearance of the person as required and the safety of any other person and the community, which may (emphasis provided) include the condition that the person—

6. Mr. Doolin’s placement on “Stand Alone Monitoring” (GPS ankle bracelet) is not the “least restrictive” condition of release.

7. Since the Court released Mr. Doolin on July 8, 2021, (with the condition of “Stand Alone Monitoring” (GPS ankle bracelet)), he continues to live with his wife in his home community of Polk City, Florida. Counsel believes he is in full compliance with all terms and conditions set forth in the Order Setting Conditions of Release. (Doc. 22) <sup>1</sup>

8. Prior to January 6, 2021, Mr. Doolin was a firefighter/EMT in Polk City, Florida. Since January 6, 2001, he has been employed full-time with a local bread delivery company. *See* letter from Aldon Haskaj, attached as an exhibit. Furthermore, he possesses an excellent reputation in his community for being a good family man, devoted to his faith, hardworking, and for being a contributing member of his community. *See* letters from Pastor Kyle Ivy, Jimmy Wilson, Morgan Doolin (wife), Jan Doolin (mother), Sam Doolin (brother). All letters are attached as an exhibit.

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<sup>1</sup> On July 29, 2021, counsel requested U.S. Pre-Trial Services to provide a compliance status update as to Mr. Doolin – which has not yet been produced.

9. Mr. Doolin is not charged with a crime of violence or a felony, therefore, “Stand Alone Monitoring” (GPS ankle bracelet) is not necessary to “reasonably assure the appearance of the person as required and the safety of any other person and the community.”

WHEREFORE, for these reasons and such other reasons that may appear just and proper, counsel respectfully requests that this motion to modify conditions of release be granted.

Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 30<sup>th</sup> day of July, 2021, a copy of the foregoing Motion For Modification Of Conditions Of Release, with a proposed Order, was delivered to case registered parties by the CM/ECF court system.

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-S-  
Allen H. Orenberg