

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA

vs.

Case No: 21-cr-00348-SCB

JEREMY BROWN

_____ /

DEFENDANT'S MOTION FOR RELEASE PENDING SENTENCING

COMES NOW, the Defendant, Jeremy Brown, by and through undersigned counsel, and hereby requests the Court to allow his release from custody pending sentencing. In support thereof, the Defense asserts as follows:

Firstly, Mr. Brown has no prior criminal history whatsoever. Mr. Brown is agreeable to any conditions this Honorable Court may impose, such as GPS monitoring, surrendering all firearms, restrictions to house confinement, as well as a monetary deposit and a mandatory psychological evaluation.

Mr. Brown has been in custody continuously since September 30, 2021 and thus he needs time to put his affairs in order. He and Ms. Aldridge, his longtime girlfriend, have lived together for years and a substantial portion

of their household income will be lost because of the loss of military and veterans benefits.

Mr. Brown has informed counsel that he has had no disciplinary reports while in custody. Defense counsel is in the process of obtaining the jail records to verify this information for the Court.

Mr. Brown is not a flight risk. He is in the process of privately retaining appellate counsel. In November 2022, Mr. Brown privately retained alternative counsel for his Washington D.C. misdemeanor cases.

Mr. Brown also needs to assist his elderly mother with putting her affairs in order for a future move to Tampa from Tyner, North Carolina. Mrs. Brown's longtime boyfriend is in extremely poor health. Mrs. Brown also is in poor health and she will need to move to Tampa when her boyfriend passes away. Mrs. Brown has two living children - Mr. Brown and his sister. The sister lives in Alaska and it will not be feasible for Mrs. Brown to move to Alaska. Thus Mrs. Brown intends to move to Tampa to live with Mr. Brown and Ms. Aldridge after her boyfriend passes away. Mr. Brown would like to help her with organizing her home for the future move, arranging for new doctors in Tampa, and otherwise assist her in preparing for this inevitable move from Tyner, North Carolina to Tampa.

The Defense further asserts that Mr. Brown's behavior during the trial is another factor for consideration. The Defendant displayed appropriate courtroom behavior at all times. He was never disruptive. He abided by all court orders during trial, such as the limitation on discussions of classified materials.

Mr. Brown recognizes that he is facing incarceration at his sentencing. However, his request for release is simply to facilitate putting his and his family's affairs in order before serving his sentence.

Defense counsel has contacted counsel for the Government, Mr. Marcet, regarding this Motion. Mr. Marcet has indicated that given that the guidelines are substantially greater than the time Mr. Brown has been in custody, the Government opposes this Motion.

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing was furnished to the Clerk of Court for e-filing and service on all interested parties on this ^{4th} 3rd day of January, 2023.

Respectfully submitted,



Melissa Loesch

Fla. Bar No. 0884251

**For the Law Offices of Roger Futerman
& Associates**

Attorneys for the Defendant

13620 49th Street North, Suite 201

Clearwater, Florida 33762

(727) 344-5511

futermanlaw@yahoo.com