

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARC BRU,

Defendant.

Case No. 21-cr-352 (JEB)

MOTION TO MODIFY CONDITIONS OF RELEASE

Mr. Marc Bru respectfully moves this Honorable Court to modify his release conditions, and allow him to travel to Arlington, Virginia for a business meeting.

Mr. Bru plans on traveling Wednesday, July 28, 2021 and will return the following day, July 29.¹

Additionally, Mr. Bru respectfully request a modification of his curfew. Mr. Bru currently has to be in his residence by 10:00 p.m. Mr. Bru, however, is employed as a cook and is often required to close the restaurant. When he is required to close, he is unable to make the 10:00 curfew. Accordingly, Mr. Bru requests a curfew of 11:00 p.m. in order to avoid a conflict with his employment.

Government counsel has represented that they will defer to the Court regarding these requests.

¹ Undersigned counsel apologizes for the late request. Counsel has been out of the office and therefore was unaware of Mr. Bru's travel plans.

Respectfully submitted,

A. J. Kramer
Federal Public Defender

/s/

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