

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

MARC ANTHONY BRU,

Defendant.

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Case No. 21-cr-352 (JEB)

**GOVERNMENT’S RESPONSE TO
DEFENDANT’S MOTION TO MODIFY CONDITIONS OF RELEASE**

In response to the defendant’s motion to modify the conditions of his release, the government states the following:

As defense counsel notes, the government defers to the Court on Mr. Bru’s request to travel. The government has no information or knowledge regarding Mr. Bru’s plans aside from those that Mr. Bru included in his motion—that the travel is for a business purpose. Defense counsel has represented that Mr. Bru would not need to travel to Washington, D.C. to travel to Arlington, Virginia, and thus would not violate his condition that he stay away from Washington, D.C., except for limited court, pretrial, or legal purposes. *See* Dkt. 7 at 2 (outlining this condition).

The government contacted the United States Pretrial and Probation Office that supervises Mr. Bru in the Eastern District of Washington. That office’s position was communicated to the government by the duty United States Pretrial/Probation Officer, and is as follows:

At this time, [the duty probation officer is] not supporting his request for travel, given the nature of his pending case and it appears he was over 30 minutes late returning from his curfew last night. [Mr. Bru’s probation officer,] USPO Schull[,] did suggest to Mr. Bru that he look into the possibility of the [business meeting occurring in Washington] instead. Therefore, we would defer to the Court to make a decision in this matter.

The government does not oppose Mr. Bru's separate request to modify his curfew to 11:00 p.m. to avoid a conflict with his employment.

Respectfully submitted,

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