

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. Specifically, Mr. Bru requests the Court remove the condition that he be required to wear an ankle monitor. The Government has represented that there is no objection to this request.

Mr. Bru has been on pre-trial release for seven months. During his time, Mr. Bru has not incurred any infractions and has remained fully compliant with his conditions of release.

Additionally, Mr. Bru is employed as a cook—a job that requires him to be on his feet and moving around in a busy kitchen for hours at a time. The constant movement and stress of working in a kitchen makes it particularly difficult to have the ankle monitor for such an extended period of time.

Given Mr. Bru's employment and compliance, Mr. Bru respectfully request the Court remove the condition that he wear an electronic ankle monitor.

The Government has requested that as part of the modifications of release, Mr. Bru be required to notify Pretrial Services if he is traveling out of his home state. Mr. Bru, through counsel, has no objection to this modification.

Respectfully submitted,

A. J. Kramer
Federal Public Defender

/s/
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