

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

BRADLEY STUART BENNETT,

Defendant.

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CRIMINAL NO. 21-CR-312-JEB

**NOTICE OF CORRECTION TO GOVERNMENT'S MEMORANDUM IN
SUPPORT OF PRETRIAL DETENTION**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully submits notice to the Court correcting a fact proffered in its Memorandum in Support of Pretrial Detention and discussed at Defendant's detention hearings on April 29, 2021, and April 30, 2021, as this fact was important to the Court in its detention decision announced on the record today.

In the government's memorandum, the following fact was proffered in good faith by the undersigned based on information and belief from discussions with FBI agents and investigators: "Defendant further admitted he threw his approximate \$1000 phone out of the window on the way to the courthouse, claiming it did not work." Doc. 18 at 7. Prior to filing the government's memorandum, the undersigned had asked the assigned case agent to review the facts proffered in the memorandum for accuracy. The case agent did not correct this statement.

After this Court's hearing today on detention, the undersigned learned from law enforcement that Defendant had stated that his phone broke, and he admitted he tossed it somewhere along 1-77. Defendant did not expressly admit that he threw the phone out of the window on the way to the courthouse. However, law enforcement inferred from this statement

that Defendant had done so, as this was the most logical route to the courthouse. The undersigned sincerely apologizes to this Court for this misunderstanding in the Defendant's statement and hereby corrects the record.

It is not known when Defendant threw the phone out the window. He last called law enforcement on April 9, 2021, from his telephone line and surrendered on April 12, 2021. Agents have reviewed call detail records for Defendant's phone and know he last used his phone at approximately 8:00 pm on April 11, 2021, approximately twelve hours before his surrender.

Respectfully submitted,

CHANNING D. PHILLIPS
Acting United States Attorney

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