

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

UNITED STATES OF AMERICA :
 :
 v. : **21-cr-0541 (PLF)**
 :
 FI DUONG, :

MOTION TO MODIFY CONDITIONS OF RELEASE

Mr. Fi Duong, the defendant, through undersigned counsel, respectfully moves this Honorable Court to modify one condition of pretrial release. Mr. Duong is supervised by Pretrial Services Officer Saul Atencio, and has been reporting to him without incident.

Mr. Duong has been on bail release since July 2, 2021. The Court did so by setting Conditions of Release. See, Docket Entry No. 8, and Mr. Duong has been fully compliant with his conditions of release.

Mr. Duong is a father to a young boy who is starting in-person school. Mr. Duong seeks to leave his home each morning around 8:10 a.m. to meet the school bus and to make sure that his son gets on the school bus. Mr. Duong would return to his home as soon as his son has climbed on to the school bus. Thus, Mr. Duong would be out of his home from 8:10 a.m. to 8:30 a.m.

Mr. Duong also seeks to pick up his son when he returns home from the school bus drop off. On half-days the drop off is at 12:30 p.m. and on full days the drop off time is 4:15 p.m. Drop off and pick up would be in front of 5730 North Kings Hwy, Alexandria, VA 22303. Thus, Mr. Duong would be out of his home from 12:25 p.m. to 12:45 p.m. when he has a half day of school or when his son has a full school day from 4:10 p.m. to 4:25 p.m.

The United States Attorney's Office through Assistant United States Attorney Allen opposes this modest request. Pretrial Services Officer takes no position as is their office policy, and for no reason specific to Mr. Duong or his compliance with his conditions of release.

WHEREFORE, for the foregoing reasons, Mr. Duong respectfully requests that the Court modify the current conditions of bail as requested in this motion.

Respectfully submitted,

A. J. KRAMER
FEDERAL PUBLIC DEFENDER

/s/

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