

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

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
)	
v.)	Case no. 1:21-cr-00312-JEB All Defendants
)	
Bradley Bennett,)	
)	
Defendant.)	

DEFENDANT’S MOTION FOR PRETRIAL RELEASE

COMES NOW Defendant, Bradley Bennett, by and through his undersigned counsel, and for his Motion for Pretrial Release, suggests to the Court as follows:

1. The Defendant and the Government have been collaboratively addressing and reconciling issues relating to the background, pedigree and actions of the Defendant such as to agree to the pretrial release of the Defendant in connection with the present matter pursuant to certain terms and conditions, including:

- i. Home detention in North Carolina;
- ii. The identification of a third-party custodian;
- iii. The identification of an acceptable residence to which the Defendant will be confined;
- iv. The requirement that the identified residence have a land telephone line;
- v. That the Defendant wear at all times an ankle monitor.

2. It is understood that U.S. Pretrial Services has identified and approved the acceptable residence for home confinement and the third-party custodian and is otherwise familiar with the terms and conditions of pretrial release discussed by the parties hereto.

WHEREFORE, Defendant prays this Honorable Court issue an Order granting the request of the Defendant, Bradley Bennett, for pretrial release subject to the terms and conditions collaboratively recommended by the parties and confirmed as workable by U.S. Pretrial Services and for such other and further relief as the Court deems just and appropriate in the circumstances.

Respectfully submitted,

KODNER WATKINS

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CERTIFICATE OF SERVICE

Signature above is also certification that on May 25, 2021, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court utilizing the CM/ECF system which will send notification of such filing to all parties of record, including

Monica Stump
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And

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