

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	CRIMINAL NO. 21-CR-312-JEB
	:	
BRADLEY STUART BENNETT,	:	
	:	
Defendant.	:	
	:	

**GOVERNMENT'S RESPONSE TO DEFENDANT'S
MOTION FOR PRETRIAL RELEASE (Doc. #34)**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully submits this response to Defendant's Motion for Pretrial Release (Doc. #34).

On April 19, 2021, following his self-surrender, Defendant was arrested in the Western District of North Carolina pursuant to this Court's arrest warrant issued on March 19, 2021. When Defendant surrendered, the Government had been looking for Defendant for approximately 20 days and believed that he was intentionally taking steps to avoid detection. The Government did not know where Defendant had been living and received information that Defendant no longer had a telephone. Though Defendant identified an address where he had been living, the Pretrial Services Officer had not verified it. The Government took the position that Defendant posed a serious risk of flight for which there are no conditions or combination of conditions that will reasonably assure Defendant's appearance as required at Defendant's detention hearing. United States Magistrate Judge G. Michael Harvey agreed, acknowledging however that this was a difficult case.

Following the detention hearings, counsel for Defendant began working with the Government to identify conditions which could reasonably assure Defendant's appearance as required. Specifically, defense counsel has identified a residence where Defendant will live with a land line, enabling GPS monitoring. Counsel also has identified a third-party custodian, Defendant's sister, who will assure Defendant's appearance at all hearings. Defense counsel further proposed and agreed to home detention. With these changed circumstances, and verification from the Pretrial Services Officer, the United States agrees to the combination of conditions presented in Defendant's Motion and does not oppose Defendant's release.

Date: May 27, 2021

Respectfully submitted,

CHANNING D. PHILLIPS
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