## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

	)	
United States	)	
	)	
v.	)	NO. 1:21cr140
	)	
Larry Brock	)	
	)	
	)	
Defendant.	)	

## CONSENT MOTION TO MODIFY CONDITIONS OF RELEASE

Comes now, the accused, Larry Brock and moves to amend his conditions of release. Mr. Brock asserts as follows:

- On April 16, 2021 this Court entered an order modifying Mr. Brock's conditions
  of release. ECF 14. The order allowed Mr. Brock to use the internet subject to
  "internet monitoring software" on his devices but prohibited most social media.
- Pursuant to this order, pretrial services installed monitoring software on Mr.
   Brock's devices. Mr. Brock has scrupulously complied with all his pretrial
   release conditions including those relating to internet use.
- 3. Mr. Brock has experienced technical difficulties with his phone which seem to relate to the monitoring app. For example, when taking photographs or following GPS directions, the monitoring app will often spontaneously restart. In addition, the monitoring app sends "alerts" to pretrial for many of Mr. Brock's personal communications with no relation to his other conditions or this case.
- 4. On January 7, undersigned counsel, counsel for the government, and a representative of pretrial met by phone to discuss the continued necessity of

internet monitoring for Mr. Brock. Following this discussion, all parties agreed that internet monitoring is no longer necessary for Mr. Brock.

For the foregoing reasons, Mr. Brock respectfully requests that this Court remove internet monitoring as one of his conditions of release. A proposed order is submitted.

Respectfully Submitted,

By:

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## CERTIFICATE OF SERVICE

I have served this filing on the government through the ecf system.

Respectfully Submitted,

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