

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

| | | |
|--------------------------|---|----------------------|
| UNITED STATES OF AMERICA | : | |
| | : | No. 21-cr-508-01-BAH |
| | : | |
| v. | : | |
| | : | |
| LUKE WESSLEY BENDER, | : | |
| | : | |
| <i>Defendant.</i> | : | |

DEFENDANT’S UNOPPOSED MOTION TO MODIFY RELEASE CONDITIONS

Defendant Luke Bender, through his undersigned counsel, files the present motion seeking a modification of his release conditions, and states as follows:

1. On April 20, 2023, Luke Bender was sentenced to serve a total of 21 months of incarceration with the Federal Bureau of Prisons (“BOP”) at a facility to be determined by BOP in its discretion.
2. On June 9, 2023, all parties received a Notice of Designation and Date to Report issued by BOP requiring Mr. Bender to report on July 6, 2023 by no later than 2:00 p.m. to Federal Correctional Institute, Butner Low, located at Butner, North Carolina.
3. Since the inception of this case, Mr. Bender has been on Global Positioning System (“GPS”) monitoring with the Pretrial Services Agency for the District of Columbia (“Pretrial Services”) through the use of an ankle monitor. Mr. Bender has been in 100 percent compliance with his GPS monitoring for almost two years. The ankle monitor is valued at approximately \$1500.00. If Mr. Bender reports to BOP with the ankle monitor, it will be cut off and not returned to Pretrial Services. Pretrial Services has requested that Mr. Bender report to its office to have his device removed.

4. In order for Mr. Bender to return his ankle monitor and be able to arrive in Butner, North Carolina by no later than 2:00 p.m. on July 6, 2023, he seeks an Order permitting him to return his GPS device on July 5, 2023.

5. Undersigned counsel has conferred with counsel for the United States and Pretrial Services Officer Christine Schuck and neither object to the relief requested in this motion.

Accordingly, Mr. Bender requests that the Court enter the Proposed Order granting the relief sought in this motion.

Dated: June 12, 2023

Respectfully submitted,

SILVERMAN|THOMPSON|SLUTKIN|WHITE, LLC

/s/ Christopher Macchiaroli

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