

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

UNITED STATES OF AMERICA

v.

BRADLEY BOKOSKI, et al.,

Defendants.

Criminal No. 1:22-cr-207

**DEFENDANT BRADLEY BOKOSKI'S UNOPPOSED MOTION TO MODIFY  
CONDITIONS OF RELEASE**

Defendant Bradley Bokoski, by and through undersigned counsel, respectfully moves the Court to modify the conditions of his pretrial release to remove the requirement to obtain permission to travel outside of the District of Utah. The government does not oppose this Motion and the relief requested. In support of his Motion, Mr. Bokoski submits the following:

1. Mr. Bokoski was arrested on May 25, 2022, in Utah in connection with an arrest warrant from this Court. The warrant was issued related to a criminal Complaint charging Mr. Bokoski with four counts: 1) Entering and Remaining in a Restricted Building or Grounds (18 U.S.C. § 1752(a)(1); 2) Disorderly and Disruptive Conduct in a Restricted Building or Ground (18 U.S.C. § 1752(a)(2); 3) Disorderly Conduct on Capitol Ground (40 U.S.C. § 5104(e)(2)(D)); and 4) Parade, Demonstrate, or Picket in any of the Capitol Buildings (40 U.S.C. § 5104(e)(2)(G)). The government alleged that the offenses occurred on January 6, 2021 at the United States Capitol.

2. Mr. Bokoski made his initial appearance in Utah on May 27, 2022 and he was released with conditions. *United States v. Bokoski*, 2:22-mj-374 (D. Ut) (Dkt No. 11).

3. On June 6, 2022, the government filed an Information charging Mr. Bokoski with the same offenses set forth in the previously filed Complaint.

4. On June 7, 2022, Mr. Bokoski made his first appearance in this Court. The Court allowed Mr. Bokoski to remain on pretrial release with conditions. Dkt. No. 16. The conditions include that Mr. Bokoski “must obtain approval from PSA for the District of Utah in advance of/ for any and all travel outside of the District of Utah [and] Defendant must receive Court approval before travel outside of the Continental United States.” *Id* at p. 3, ¶ 7(t).

5. Mr. Bokoski has no criminal record. It is undersigned counsel’s understanding that in most of the cases arising from the events of January 6, 2021, the defendants have been released on a standard condition that requires notice of travel outside of his or her home district, but not approval of PSA. Travel outside of the continental United States and internationally requires Court approval.

6. Mr. Bokoski has complied with all conditions of his conditions of release. The government does not oppose the requested modification.

Based on the foregoing, Mr. Bokoski respectfully requests that his conditions of release be modified to only require advance notice of travel outside of the District of Utah, subject to the existing restrictions on travel outside of the United States or international.

Respectfully Submitted,

/s/ Marc Eisenstein  
Marc Eisenstein  
Coburn & Greenbaum, PLLC  
1710 Rhode Island Avenue, N.W. 2<sup>nd</sup> Fl.  
Washington, DC 20036  
Phone: (202) 643-9472  
Fax: (866) 561-9712  
marc@coburngreenbaum.com

*Counsel to Defendant Bradley Bokoski*

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on August 10, 2022 a copy of the foregoing was filed with the Clerk of the Court and served on all counsel of record via ECF.

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/s/  
Marc Eisenstein