

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

UNITED STATES OF AMERICA,)	
)	
v.)	
)	CRIM NO. 22-MJ-00069
JERRY BRAUN,)	Judge: Harvey
)	
)	
Defendant.)	

UNOPPOSED MOTION TO MODIFY RELEASE CONDITIONS

COMES NOW defendant Jerry Braun, through counsel, and request their motions to modify their release conditions so as to remove any curfew requirements on Mr. Braun. As reasons therefor, defendant states as follows:

1. Defendant Jerry Braun is currently charged by complaint with three charges: 1) 18 U.S.C. § 231(a)(3), Obstruction During Civil Disorder; 2) 18 U.S.C. § 1752(a)(1)(2) and (4), Engaging and Remaining in a Building; and 3) 40 U.S.C. § 5104(e)(2)(F), Violent Entry or Disorderly Conduct.

2. Mr. Braun was arrested on or about April 12, 2022. He was seen by Magistrate Judge Rocconi in the Central District of California. At that time, Mr. Braun was given release conditions which included a curfew “as directed by Supervising Agency.” Preconditions of Release at 3. A copy of the Preconditions of

Release is attached hereto as Exhibit A. At that time, he also was ordered to appear before the Magistrate Judge Harvey in the United States District Court for the District of Columbia on April 19, 2022

3. On April 19, 2022, Mr. Braun appeared before Magistrate Judge Harvey in the District of Columbia. At that time Mr. Braun was ordered to follow less stringent release conditions than those originally ordered in the Central District of California, which did not include a curfew.

4. In conversations with Mr. Braun, he has indicated that his pretrial services officer in California is still enforcing the curfew requirements, despite the District of Columbia Court not having ordered a curfew, nor the government requesting it at the time Mr. Braun appeared in court in the District of Columbia.

5. Mr. Braun is currently employed at Ben Co, which is located close to his residence. Currently, however, the company is relocating equipment to another location that is 2 hours away and Mr. Braun will need to deliver the equipment. That may require Mr. Braun to be away from his residence during some evenings and therefore be in violation of the curfew he is currently following. A letter from Ben Co is attached hereto as Exhibit B.

6. Accordingly, for purposes of his employment, Mr. Braun would like an order from the court rescinding any and all curfew requirements imposed on him while this case is pending.

7. The defense has communicated to AUSA James Peterson who has indicated that the government does not oppose this request.

WHEREFORE, for the reasons explained above, the defense respectfully requests that the Mr. Braun's release conditions be vacated to rescind any curfew requirement set upon him.

Respectfully submitted,

JERRY BRAUN
By Counsel

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Certificate of Service

I hereby certify that a true copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system this 21st day of August, 2022, which will send a notification of such filing (NEF) to the following to all counsel of record.

/s/John L. Machado
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