

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

UNITED STATES OF AMERICA

Civil Action No.: 3:21-cr-00087-VAB

*Plaintiff*

vs.

DENNIS A. BRADLEY

November 22, 2024

*Defendant*

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**MOTION TO MODIFY CONDITIONS OF RELEASE**

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Defendant, Dennis Bradley, through the undersigned counsel, requests that this Court modify and permit his conditions of release so that he may attend the baby shower of a life long friend on December 7, 2024, in Fort Lauderdale, Florida. In support of his motion, he states as follows:

1. On March 12, 2024, this Court modified Attorney Bradley's conditions of release permitting unrestricted travel within New York, Massachusetts, and Connecticut. (DKT No. 251)
2. On that same day, this Court also stated within its text order: "If the defendant would like to travel outside of these states at any time, he simply needs to file a motion with the Court seeking permission and setting out the positions of the government and the Probation Office." (DKT No. 251)
3. Here, Attorney Bradley is seeking to travel to South Florida, on December 6, 2024 and will return on or before December 9, 2024.

4. More specifically he is seeking to travel to South Florida during that weekend so that he may attend and help host the baby shower of a long time friend who is having her first child. A copy of the Baby Shower Invitation is attached hereto as **Exhibit A**.

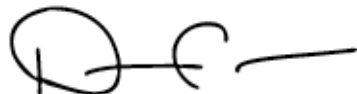
5. It is also worth noting that this case has been pending for over three years and Attorney Bradley has always been compliant with the terms of his release.

1. Undersigned counsel has contacted the United States Attorneys Office, who indicated the government takes “no position” to the requested relief in this motion.

2. Undersigned counsel has contacted the United States Probation Office, specifically, Thomas Walden, who is the Defendant’s probation officer, who indicated he does not object to the relief requested in this motion.

3. WHEREFORE, and on behalf of Attorney Dennis Bradley, the undersigned asks this Honorable Court to permit him to travel to South Florida on Friday, December 6, 2024 and return on or before Monday, December 9, 2024.

Respectfully submitted by:



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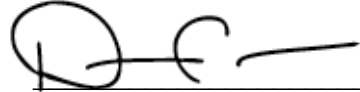
Dated: November 22, 2024

DEFENDANT’S COUNSEL

**CERTIFICATION**

I HEREBY CERTIFY that on November 22, 2024, a copy of the foregoing motion was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

Respectfully submitted by:



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