

SHER TREMONTE LLP

May 3, 2017

BY ECF

The Honorable Pamela K. Chen
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Brayán Jiménez*, 15 Crim. 252 (PKC)

Dear Judge Levy:

We represent Brayán Jiménez in the above-captioned action. We write, with the consent of the government, to respectfully request that the Court modify the terms of Mr. Jiménez's bond to remove the location monitoring condition. On March 2, 2016, Mr. Jiménez was released on a \$1.5 million bond, ultimately co-signed by three sureties secured by real property. Pursuant to the terms of the current bond, Mr. Jiménez is subject to a curfew and location monitoring, and his travel is restricted to the Southern District of Florida and to travel between the Southern District of Florida and the New York area for the purpose of meeting with his attorneys and appearing in court.

With the government's consent, we write to respectfully request that the Court modify Mr. Jiménez's bond by removing the location monitoring condition. Mr. Jiménez will still be obligated to comply with the other conditions of his release, including having a curfew as directed by Pretrial Services, and to be monitored by an automated phone system.

The government and Pretrial Services have no objection to the requested modification.

We appreciate the Court's consideration.

Respectfully submitted,

/s/

Justine A. Harris
Valerie A. Gotlib

cc: All counsel of record (by ECF)