

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION**

UNITED STATES OF AMERICA

v.

Case No. 2:21-CR-74-TPB-MRM

AMBER BRUEY

UNOPPOSED MOTION TO PERMIT DEFENDANT TO TRAVEL

COMES NOW, Amber Bruey, through counsel, and seeks an Order permitting her to travel to Norfolk, Virginia, to confer with a mental-health counselor on Monday, January 31, 2022. In support of this motion, Ms. Bruey states as follows:

1. On September 17, 2021, the Federal Defender was appointed to represent Ms. Bruey. (Docs. 23, 28). She pleaded not guilty at that Court date and the conditions of her release were adopted by this Court. (Docs. 14-1 and 23).
2. No condition of release requires Ms. Bruey to participate in mental-health counseling if directed by her United States Pre-Trial Officer.
3. The conditions of release, however, do restrict Ms. Bruey's travel to the Eastern District of North Carolina. (Condition 7(f) at Doc. 14-1).
4. Ms. Bruey has an appointment to confer with a mental-health counselor in Norfolk, Virginia, beginning at 10 a.m. on Monday, January 31, 2022.

5. The mental-health counselor with whom Ms. Bruey is scheduled to confer is a licensed clinical psychologist in the Commonwealth of Virginia.
6. Upon information and belief, the source being investigation conducted by the Office of the Federal Defender, while the distance from Ms. Bruey's North Carolina residence to Norfolk, Virginia, is about 60 miles, the distance from Ms. Bruey's residence to mental-health counselors situated in the Eastern District of North Carolina – Raleigh and Greenville, respectively -- is about 165 miles and 80 miles.
7. On January 21, 2022, Assistant United States Attorney Trent Reichling advised undersigned counsel that the government did not object to an Order permitting Ms. Bruey to travel outside of the Eastern District of North Carolina and to Norfolk, Virginia, on January 31, 2022, to confer with a mental-health counselor.
8. If permitted to travel to Norfolk, Virginia, on January 31, 2022, Mr. Bruey will return to the Eastern District of North Carolina before February 1, 2022.
9. Finally, on January 24, 2022, Ms. Bruey's pre-trial officer advised undersigned counsel that Ms. Bruey would not be permitted to leave the Eastern District of North Carolina on January 31, 2022, to confer with a mental-health counselor in Norfolk, Virginia, absent permission to do so

from this Court.

10. In light of all of the above, Ms. Bruey now respectfully seeks an Order permitting her to travel outside of the Eastern District of North Carolina on January 31, 2022. This Order would allow her to travel to Norfolk, Virginia and require her to return to the Eastern District of North Carolina before February 1, 2022.

WHEREFORE, premises considered, Ms. Bruey respectfully moves for an Order allowing her to travel to Norfolk, Virginia, on January 31, 2022, to confer with a mental-health counselor located in Norfolk, Virginia.

Respectfully Submitted,

A. Fitzgerald Hall, Esq.
Federal Defender
Middle District of Florida

By: /s/James Lappan
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 24th day of January 2022, the foregoing was electronically filed with the Clerk of Court and a copy will be sent electronically to Trent Reichling, Assistant United States Attorney, 2110 First Street, Fort Myers, FL 33901.

/s/ James Lappan
James Lappan, Esq.
Assistant Federal Defender