

**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 from her North Carolina residence to Fort Myers, Florida, to attend the sentencing hearing for her co-defendant scheduled in this Division to take place on May 20, 2022. (Doc. 60). In further 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). Ms. Bruey pleaded guilty to the indictment on March 16, 2022 (Doc. 69) and her sentencing is set for June 24, 2022. (Doc. 73).
2. Throughout this matter, Ms. Bruey was been released on conditions originally established in Eastern Division of North Carolina and subsequently adopted by this Court. (Docs. 14-1 and 23).

3. As the May 20 sentencing hearing in Fort Myers is not Ms. Bruey's sentencing hearing, Ms. Bruey requires permission from this Court to travel. *See* Condition 7(f) at Doc. 14-1.
4. Ms. Bruey respectfully seeks permission to leave North Carolina by automobile with her co-defendant and their children on May 17, 2022. If this is granted, then she seeks permission to return to her North Carolina residence on or before Sunday, May 22, 2022.
5. On May 2, 2022, undersigned counsel spoke telephonically with Ms. Bruey's U.S. Pretrial Services Officer in North Carolina and was advised that that officer does not object to the travel outlined in this motion so long as the Court approves the travel.
6. On May 2, 2022, Assistant United States Attorney Trent Reichling advised undersigned counsel that the government did not object to the relief sought herein.
7. 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 and to Fort Myers on May 17, 2022. This Order would allow her to the Eastern District of North Carolina on or before May 22, 2022.

WHEREFORE, premises considered, Ms. Bruey respectfully moves for an Order permitting the relief sought herein.

Respectfully Submitted,

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

By: /s/James Lappan
James Lappan, Esq.
Florida Bar No. 160792
Assistant Federal Defender
2075 West First St., Suite 300
Ft. Myers, Florida 33901
Telephone: 239-334-0397
Fax: 239-334-4109
E-Mail: jim_lappan@fd.org

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 2nd day of May 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