

JOHN L. RUSSO
ATTORNEY AT LAW

COUNSEL
Milton Florez, Esq.
Michael Horn, Esq.

J.L. Russo, P.C.
31 · 19 Newtown Avenue, Suite 500
Astoria, New York 11102
Tel: 718 · 777 · 1277
Fax: 718 · 204 · 2310
Email: JLRussoPC@Gmail.com

PARALEGAL
Maria Nunez, B.S.

December 7, 2023

Via ECF

Honorable André M. Espinosa
United States Magistrate Judge
United State District Court
District of New Jersey
Martin Luther King Jr. Courthouse
50 Walnut Street
Room 2037, Courtroom 2D
Newark, NJ 07102

Re: United States of America v. Damaris Valerio a/k/a Damaris Tineo Abreu
Mag. No.: 23-11198

Your Honor:

This office represents Damaris Valerio in the above-referenced matter. We write with the consent of both, Pretrial Officer Sophia Grigolo and AUSA Fatime Cano to request a modification of Ms. Valerio's pretrial release and bail conditions.

We respectfully request that Ms. Valerio's pretrial release and bail conditions be amended, so as to permit travel in the District of New Jersey and the Southern and Eastern Districts of New York.

The Court's consideration of this request is respectfully appreciated. A proposed Order is attached hereto. Thank you.

Yours truly,

John Russo

John L. Russo (JR6200)

Cc: AUSA Fatime Cano (via ECF)
USP Sophia Grigolo (via Email)