

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 23-cr-80141-DMM
	)	
EMMAUEL BULLY, JR.	)	
	)	
Defendant.	)	

DEFENDANT'S OBJECTIONS TO PRESENTENCE INVESTIGATION REPORT

Comes now Defendant, by his undersigned attorney, and for his Objections to
Presentence Investigation Report states:

Introduction

Probation Officer Garcia is to be commended for the thoroughness of the
Presentence Investigation Report. Her thoroughness is impressive in light of the limited time
she had to prepare the PSR.

The PSR was received by the undersigned on November 1, 2023, and it was sent to
Mr. Bully for his review shortly after. On Sunday November 12, 2023, the undersigned
met with Mr. Bully and went through the PSR. He advised the undersigned which
objections he desired to make to the PSR.

Thereafter, the undersigned spoke with Mr. Bully to ensure that Mr. Bully desired to
make the following objections to the PSR. As such, the objections are made with
Defendant's knowledge and at his behest.

Since a final PSR has not been prepared and since objections are due this date, the undersigned is filing these objections and, if need be, will file amended objections depending on the ultimate conclusions reached by Officer Garcia.

Objections

1. Defendant objects to paragraph 17 and states that to the best of his knowledge that MB Tax Consultants was reinstated with the Florida Division of Corporations on February 24, 2020.

2. Defendant objects to paragraph 25 and states that to the best of his knowledge he did not intend, and could not have had such intention, to attempt to obtain "\$1,394.27" because the applications did not specify any amount sought or requested, and the Defendant did not know what if any funds were going to be provided in connection with any application submitted by the Defendant.

3. Defendant objects to paragraph 42 and states that although he was arrested on May 18, 2011, for driving under the influence (the "DUI"), that conduct is wholly unrelated to the current and isolated conduct the Defendant is being sentenced for now; which was heavily influenced by the COVID pandemic. Moreover, the DUI is almost 10 years from the conduct that forms the subject of this action.

4. Defendant objects to paragraph 57 and states that his back injury requires physical therapy due to the surgeries to repair it and resulting chronic condition.

5. Defendant objects to paragraph 68 and states that to the best of his knowledge he completed approximately 45 credits. He earned 30 credits in his first year alone and attended during the summer sessions as well.

6. Defendant objects to paragraph 70 and states that to the best of his knowledge that he did graduate and participated in the graduation ceremony.

7. Defendant objects to paragraph 81 and states that to the best of his knowledge he sold the Maserati (the "Vehicle") in 2019 to a car dealership in Delray Beach, off

Linton Blvd. just I-95 East (across from the McDonald's and next to the Mercedes Benz dealer), which is no longer in business. Notwithstanding the forgoing, under no circumstances did the Defendant knowingly misrepresent his ownership of the Vehicle to Officer Garcia.

8. Defendant files these objections to merely clarify the record and hopes to resolve these objections prior to the current sentencing hearing on December 7, 2023, and is not desirous of delaying or postponing said hearing.

WHEREFORE, Defendant hereby files his objections to the Presentence Investigation Report and respectfully asks that the Government be required to carry its burden to prove the conclusions contained in the PSR in connection with any unresolved objections herein.

The Bravo Law Firm, PLLC

/s/ Jason Bravo
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Certificate of Service

I certify that on November 15, 2023, this document was filed with the Clerk's CM/ ECF System, which will provide notice to all parties.

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