

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 23-CR-80141-DMM

UNITED STATES OF AMERICA,	:
	:
Plaintiff,	:
	:
v.	:
	:
EMMANUEL BULLY, JR,	:
	:
Defendant.	:
.....	:

MOTION FOR EARLY TERMINATION OF SUPERVISED RELEASE

The Defendant, EMMANUEL BULLY, JR, through undersigned counsel, pursuant to 18 U.S.C. § 3583(E)(1) and [with/without] the agreement of the United States Attorney's Office, respectfully requests that this Honorable Court enter an Order terminating the balance of his supervised release. In support, Mr. Bully states as follows:

1. On December 7, 2023, Mr. Bully was sentenced to 24 months of incarceration followed by two years of supervised release. Mr. Bully served his sentence and was released on January 15, 2025, to begin serving his sentence of supervised release with special conditions.

2 Mr. Bully successfully completed a total of 250 hours of community service. See letter from *The Underline* attached as Exhibit A. *The Underline* is a community organization tasked with the care, maintenance, and utilization of the park space below the Metrorail in Miami. Mr. Bully demonstrated his commitment to the organization through hands on volunteer work cleaning trash and debris, weeding out overgrown areas, and assisting in Family Day events for the community. *Id.*

3. Mr. Bully also renewed his faith with family and loved ones; being Baptized in his church and attending events with his church community doing good works and expressing their beliefs. See Certificate of Baptism attached as Exhibit B.

4. Since his release, and in addition to his work, family, church, and community service, Mr. Bully returned to school to complete his Bachelor's Degree. Mr. Bully attended Florida Atlantic University and graduated in December of 2025 with a Bachelor's Degree in Science. See attached composite Exhibit C.

5. Mr. Bully has been employed by Taylor Sports Group since his release. Mr. Bully has served in an administrative role within the company, supporting and managing the needs of its and is looking forward to expanding his responsibilities.

MEMORANDUM OF LAW

Supervised release eases a defendant's transition to community life and facilitates training and rehabilitation. *See United States v. Johnson*, 529 U.S. 53, 59-60 (2000). Mr. Bully is asking for that opportunity. Where continued supervision no longer serves the goals at sentencing for the rehabilitated, it may be terminated early. Thus, district court may, after considering the factors in Sections 3553(a)(1), (a)(2)(B), (a)(2)(C), (a)(2)(D), (a)(4), (a)(5), (a)(6) and (a)(7):

terminate a term of supervised release and discharge the defendant released at any time after the expiration of one year of supervised release, pursuant to the provisions of the Federal Rules of Criminal Procedure relating to the modification of probation, if it is satisfied that such action is warranted by the conduct of the defendant released and the interest of justice.

18 U.S.C. § 3583(e)(1).

In determining whether early termination is warranted, the district court must consider the nature and circumstances of the offense and the history and characteristics of the

defendant; the need for deterrence, to protect the public, and to provide correctional treatment for the defendant; the advisory Sentencing Guidelines and pertinent U.S. Sentencing Commission policy statements; the need to avoid unwarranted sentencing disparities; and the need to provide restitution to any victims of the offense.

United States v. Cochran, 815 Fed.Appx. 361, 363 (11th Cir. 2020); see also *United States v. Reagan*, 162 Fed.Appx. 912, 914 (11th Cir. 2006); 18 U.S.C. §§ 3553(a), 3553(e)(1).

Because the language of Section 3583(e)(1) notes that the district court “may” terminate supervised release if it is satisfied that “such action is warranted by the conduct of the defendant released and the interest of justice,” a district court has discretion in deciding whether to terminate a defendant’s supervised release. See *United States v. Perry*, 397 Fed.Appx. 521 (11th Cir. 2010); *United States v. Johnson*, 877 F.3d 993, 997 (11th Cir. 2017) (“We review a district court’s denial of a motion for early termination of supervised release for an abuse of discretion.”). The phrase “the interest of justice” gives the court latitude to consider a broad range of factors in addition to a defendant’s behavior in considering whether to terminate her supervised release. *United States v. Pregent*, 190 F.3d 279, 282 (4th Cir. 1999).

“Occasionally, changed circumstances – for instance, exceptionally good behavior by the defendant or a downward turn in the defendant’s ability to pay a fine or restitution imposed as conditions of release – will render a previously imposed term or condition of release either too harsh or inappropriately tailored to serve the general punishment goals of section 3553(a).” *United States v. Lussier*, 104 F.3d 32, 36 (2nd Cir. 1997).

The Guide to Judiciary Policy Section (e) states that after the expiration of one year of supervised release in subsequent assessments, there is a presumption in favor of recommending early termination for probationers and supervised releasees:

(1) Who have been under supervision for at least 18 months and (a) are not career violent and/or drug offenders (as described in 28 U.S.C. § 994(h)), sex offenders, or terrorists, (b) present no identified risk to the public or victims, and (c) are free from any moderate (see: Guide, Vol 8E, § 620.40.20) or high (see: § 620.40.30) severity violations; and

(2) Who have been under supervision for at least 42 months and (a) are not career violent and/or drug offenders (as described in 28 U.S.C. § 994(h)), sex offenders, or terrorists, and (B) are free from any moderate (see: Guide, Vol 8E, § 620.40.20) or high (see: § 620.40.30) severity violations.

Guide to Judiciary Policy, Vol. 8E, Ch. 3 § 380.10(b), “Early Termination” (Monograph 109) (rev’d 2010) (emphasis added).

Pursuant to this policy, “there is a presumption in favor of recommending early termination” for supervisees after 12 months if they are not “career violent and/or drug offenders, sex offenders, or terrorists,” if they “present no identified risk to the public or victims,” and if they are “free from any moderate or high severity violations.” *Id.*, §380.10(g).

The early termination of Mr. Bully’s supervised release is appropriate given his conduct. He gave his time in community service, he graduated from Florida Atlantic University with a Bachelor’s degree, he re-established his faith and has done so while being employed.

Pursuant to Local Rule 88.9, undersigned made numerous attempts to obtain the position of the United States attorney and has received no response to both emails and phone calls, thus the position of the United States is unknown.

WHEREFORE, the Defendant, EMMANUEL BULLY, JR, through undersigned counsel, and pursuant to 18 U.S.C. § 3583(E)(1), respectfully requests that this Honorable Court enter an Order terminating the balance of his supervised release.

Respectfully submitted,

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Miami, FL 33138
Telephone: (305) 373-6773
E-mail: petruzzi-law@msn.com

By: **/s/ Paul D. Petruzzi**
PAUL D. PETRUZZI, ESQ.
Florida Bar No. 982059

CERTIFICATE OF SERVICE

I hereby certify that, on February 27, 2026, a true and correct copy of the foregoing was furnished by CM/ECF to all parties of record.

By: **/s/ Paul D. Petruzzi**
PAUL D. PETRUZZI, ESQ.
Attorney for Defendant



1800 SW 1st Ave.
Suite 504
Miami, FL 33129

To Whom It May Concern,

This letter is to verify that Emmanuel Bully successfully completed a total of 250 hours of community service during the year 2025.

The community service hours were fulfilled through consistent participation and contribution, demonstrating responsibility, commitment, and dedication to serving the community. This included park clean-up, day in the dirt (planting and weeding), along with Family Day events.

If you require any additional information or verification, please feel free to contact me.

Sincerely,
Lisle Bowen
CMO, Friends of The Underline

The Underline

The Underline Conservancy's Mission: To deliver and maintain a first-class 10-mile linear park and urban trail and provide engaging community-based health, wellness, public art, culture, and educational programming for all.



FLORIDA ATLANTIC UNIVERSITY
Commencement

THURSDAY, DECEMBER 11, 2025
9 A.M. • 1 P.M. • 5 P.M.

FRIDAY, DECEMBER 12, 2025
9 A.M. • 1 P.M. • 5 P.M.

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FLORIDA ATLANTIC
UNIVERSITY

07:23
MYFAU

Fall 2025 Commencement - Important Reminders

OR

Office of the Registrar (Commenceme... ..

To: Manny Bully

Fri 11/21/2025 12:09 PM

Hello Emmanuel,

Congratulations on your upcoming graduation! Here are some important reminders for you and your guests as you prepare for the Fall commencement ceremonies taking place on Thursday, December 11th and Friday, December 12th in the Carole and Barry Kaye Performing Arts Auditorium located in the Student Union on the Boca Raton Campus. **Please share this important information with your guests.**

Graduate and Guest Arrival: Graduates are required to check in at the Live Oak Pavilion one hour before the ceremony to prepare for the processional. The doors to the Carole and Barry Kaye Auditorium will also open one hour before the ceremony where guests tickets will be scanned. Both graduates and guests are strongly encouraged to arrive early, allowing ample time to park and pass through the security screening. **Please note that the procession of graduates will begin 20 minutes prior to the start of the ceremony. During this time, security lines will be temporarily halted, and guests will not be able to enter the Student Union until all graduates and members of the platform party have been seated. We strongly encourage guests to take this into consideration**



Reply



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Jean-Robert J. Auguste
Dane Egelston Black
Kahzir Brown
Bennett Robert Buch
Emmanuel Bully Jr.
James Patrick Callaway II
Daphnie Amanda Cenatus
Matthew James Cooper
Grace Denny
Justin Desnoyers
Spencer Harwell Duncan

Shy'Nice Early
Nicholas Emil Fioravanti
Rohan Gabriel
Nirvana Gopeesingh
Stephanie Louis-Juste
Paul Vicente Maldonado
Carleen Marie Rafey
Bernard Andrew Sarasohn
Laurie Ann Silver Mindlin*
Karlle Ann Stevens
Lauren M. Woods

BACHELOR OF HEALTH SERVICES

Ebosetale Casey Airemen
Raffaella Afizan Avella**
Aiyana Kaleena Bigini
Martnae Veronica Brown
Breyana Cenatus
Jose Antonio Garcia
Jimenez
Tyler James Glassburn
Jessica Hammontree

Diana Paola Herrera
Leah Rebekah Kelly**
Kimberly Lubin
Oslena Martinez**
Heba A. Qureshi*
Luana Oliveira Rodrigues
Christopher Theus*
Hamza Tous
Natalie Marie Warren



