UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA,

Plaintiff, Case No.: 8:21-mj-01294-AAS-1

vs.

JULIO ENRIQUE LUGO,

Defendant.
_____/

DEFENDANT'S UNOPPOSED MOTION TO AMEND ONE (1) BOND CONDITION

Defendant, **JULIO ENRIQUE LUGO ("Mr. Lugo")**, by and through undersigned counsel, hereby files this Unopposed Motion to Amend One (1) Bond Condition, and, as grounds therefore, states as follows:

1. On March 26, 2021, Mr. Lugo was charged by Complaint with conspiracy to defraud the Small Business Administration in violation of 18 U.S.C. § 371 and illegal monetary transactions in violation of 18 U.S.C. § 1957. (D.E. 1).

2. On April 1, 2021, Mr. Lugo was arrested in relation to this matter.

3. That same day (April 1, 2021), Judge Wilson granted Mr. Lugo a personal surety bond in the amount of $100,000.00, (D.E. 8), a condition of which was that Mr. Lugo "must not, at any time, for any reason whatsoever, leave the

Middle District of Florida without first obtaining the permission of the court," (D.E. 10).

4. Mr. Lugo recently retained undersigned counsel, whose primary office is located in Miami, Florida.

5. Additionally, Mr. Lugo has a prior matter in the Southern District of Florida (Case No. 14-cr-60105-JIC), which will require him to travel to Fort Lauderdale, Florida.

6. As such, Mr. Lugo respectfully requests that his bond conditions be modified, so that he may travel within the Southern and Middle Districts of Florida during the pendency of this case.

7. Undersigned Counsel has conferred with Assistant United States Attorney Kristen Fiore, who advised the Government has **no objection** to the relief requested herein.

WHEREFORE, Defendant, **JULIO ENRIQUE LUGO**, respectfully requests this Honorable Court grant this Unopposed Motion to Amend One (1) Bond Condition, and grant such other relief as is just and proper.

Respectfully submitted,

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By: s/Brian H. Bieber
BRIAN H. BIEBER
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 7, 2021, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

s/Brian H. Bieber
BRIAN H. BIEBER