IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA,	:	
	:	
v.	:	Case No.: 8:23-cr-00347-LKG-1
	:	
RENARD RASHEED BROWN	:	
	:	
Defendant.	:	

MOTION FOR BOND REVIEW

The Defendant, by and through undersigned counsel, respectfully moves this Honorable Court to review the conditions of release in the above-captioned matter. In support of this Motion, the Defendant states as follows:

1. The Defendant is charged with one count of possession of a firearm and ammunition after having been convicted of a crime punishable by imprisonment for a term exceeding one year, in violation of 18 U.S.C. § 922(g)(1).

2. The Defendant was arrested for this offense on March 6, 2023, by members of the Prince George's County Police Department. At the time of his arrest, the firearm was found in his vehicle. Other than the alleged possession of the firearm, no additional criminal conduct has been alleged.

3. Following his arrest, the Defendant was charged in the District Court of Maryland for Prince George's County. These charges were subsequently dismissed after the Defendant was indicted in this Court in the above-captioned matter.

4. The predicate offense underlying the current federal charge occurred over twenty years ago, in 2003.

5. Upon information and belief, the Defendant has not been convicted of any serious offenses in the intervening years.

6. The Defendant has not yet been able to resolve this case and respectfully requests that he be released pending resolution.

7. The Defendant has substantial ties to the community. He is a father and grandfather, with children and grandchildren residing in the area who rely on his presence and support.

8. The Defendant is a skilled carpenter with extensive experience and has been gainfully employed in the construction industry for many years.

9. Upon release, the Defendant is able to reside with his family and is expected to return to gainful employment in the community.

10. The Defendant respectfully requests that this Court impose reasonable conditions of release to ensure his appearance at all proceedings while allowing him to return to the community.

WHEREFORE, the Defendant respectfully requests that this Honorable Court review the conditions of release and impose reasonable conditions to facilitate his release pending the resolution of this case.

Respectfully submitted,
ROBERTS AND WOOD

/s/ *Douglas J. Wood*
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Motion for Bond Review was electronically filed on December 23, 2024, via the CM/ECF system. Notification of this filing along with an electronic copy was delivered to:

AUSA Nicholas Fish Potter
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Greenbelt, Maryland 20770
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/s/ *Douglas J. Wood*
Douglas J. Wood