

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

---

UNITED STATES OF AMERICA,

Plaintiff,

v.

**REPLY TO GOVERNMENT'S  
MEMORANDUM IN RESPONSE  
TO DEFENDANT'S MOTION TO  
MODIFY CONDITIONS OF  
RELEASE**

Larry Reynolds,

Court File: CR-08-320 (PAM/FLN)

Defendants.

---

The Defendant, by and through the undersigned attorney, hereby submits this brief memorandum in reply to the Government's position regarding the Defendant's motion to be released from electronic monitoring.

The Government concedes that the Defendant has been fully compliant with his conditions of release. To the other grounds for release stated in the Defendant's original motion, the Government has offered no response; hence, the Court may deem those assertions admitted. The single reason asserted to maintain the restrictions on the Defendant is "... because he is being supervised in the Los Angeles area..."

The Defendant's full compliance with the laws and rules, his standing \$2.5 million bond, and the necessity for his cooperation with both the Government and the Receiver militate justly to granting the Defendant's motion for release from electronic monitoring, an unwieldy expensive and unnecessary restriction.

Dated March 24, 2009.

Respectfully submitted,

FREDERIC BRUNO & ASSOCIATES

/s/ Frederic Bruno

Frederic Bruno, #123213

5500 Wayzata Boulevard, Suite 1450

Minneapolis, MN 55416

763-545-7900

Attorney for Larry Reynolds