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Attorney for Defendant, *Fred Magaña*

**UNITED STATES DISTRICT COURT
 FOR THE SOUTHERN DISTRICT OF CALIFORNIA
 (THE HONORABLE BERNARD G. SKOMAL)**

UNITED STATES OF AMERICA,

Case No. 19CR4768-GPC (bgs)

Plaintiff,

v.

FRED MAGAÑA,

***CORRECTED UNOPPOSED
 MOTION TO MODIFY
 CONDITIONS OF PRETRIAL
 RELEASE TO PERMIT TRAVEL***

Defendant.

TO: RANDY S. GROSSMAN, ACTING UNITED STATES ATTORNEY; ANDREW R. HADEN AND NICHOLAS W. PILCHAK, ASSISTANT UNITED STATES ATTORNEYS; LUCAS GRAVELL, U.S. PRETRIAL SERVICES OFFICER:

Defendant Fred Magaña (Mr. Magaña), by and through his counsel, Ezekiel E. Cortez, hereby moves this Court to modify his bond conditions to permit him to travel to Big Bear Lake, California from March 29, 2021 through March 30, 2021. Assistant United States Attorney Nicholas W. Pilchak was contacted and does not oppose this request. Mr. Magaña's supervising pretrial services officer, Officer Lucas Gravel, does not have an objection to the travel. Yamina G. Huertas, Mr. Magaña's wife and surety, supports this request as well.

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*Unopposed Motion to Modify Bond Conditions to Permit Travel,
 U.S. v. Fred Magaña, Case No. 19CR4768-GPC (bgs)*

1 Mr. Magaña respectfully requests that he be permitted to travel to Big Bear Lake
 2 Village in the Central District for his son's birthday on March 29, 2021. With the
 3 Court's permission, he will travel on March 29th for a day trip. If weather conditions
 4 impede their safe return home the same day, Mr. Magaña and his family will secure
 5 lodging and stay through March 30, 2021.

6 Magaña remains entirely compliant with all his bond conditions and has
 7 demonstrated his trustworthiness while on pretrial release. He will provide additional
 8 details of this travel to his pretrial services officer, Lucas Gravel, and will keep him
 9 informed if there are any changes. Mr. Magaña will also contact Officer Gravel to
 10 check in before leaving and immediately upon his return home to the Southern District.

11 CONCLUSION

12 For the above reasons, Fred Magaña respectfully asks this Court to modify his
 13 bond conditions to allow him to travel to Big Bear Lake, California from March 29,
 14 2021 through March 30, 2021.

15 Respectfully submitted,

16 Date: March 24, 2021

17 /s/ Ezekiel E. Cortez
 18 EZEKIEL E. CORTEZ
 19 Attorney for Defendant,
 20 Fred Magaña

21 /s/ Nicholas W. Pilchak (by consent)
 22 NICHOLAS W. PILCHAK
 23 Assistant U.S. Attorney
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