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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,

Plaintiff,

v.

FRED MAGAÑA,

Defendant.

Case No. 19CR4768-GPC (bgs)

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

TO: RANDY S. GROSSMAN, ACTING UNITED STATES ATTORNEY; ANDREW R. HADEN AND NICHOLAS W. PILCHAK, ASSISTANT UNITED STATES ATTORNEYS; MICHELLE ARVAYO, 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 Murrieta, California on November 25, 2021 through November 26, 2021. Assistant United States Attorney Nicholas W. Pilchak was contacted and does not oppose this request. Mr. Magaña's supervising pretrial services officer, Officer Michelle Arvayo, 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 his sister's  
 2 home in Murrieta (Central District) for an overnight trip with his son for the  
 3 Thanksgiving holiday. With the Court's permission, Mr. Magaña will drive to his  
 4 sister's house on Thursday, November 25, 2021 and return home on Friday, November  
 5 26, 2021.

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

## 12 CONCLUSION

13 For the above reasons, Fred Magaña respectfully asks this Court to modify his  
 14 bond conditions to allow him to travel to Murrieta, California on November 25, 2021  
 15 through November 26, 2021.

16 Respectfully submitted,

17 Date: November 17, 2021

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

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