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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,

Defendant.

**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 December 24, 2021 through December 25, 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

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

1 this request as well.

2 Mr. Magaña respectfully requests that he be permitted to travel to his
3 sister's home in Murrieta (Central District) for an overnight trip with his
4 son for the Christmas holiday. With the Court's permission, Mr. Magaña
5 will drive to his sister's house on Friday, December 24, 2021 and return
6 home on Saturday, December 25, 2021.

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

14 CONCLUSION

15 For the above reasons, Fred Magaña respectfully asks this Court to
16 modify his bond conditions to allow him to travel to Murrieta, California on
17 December 24, 2021 through December 25, 2021.

18 Respectfully submitted,

19 Date: December 16, 2021

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

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