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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)

**CORRECTED 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; LUCAS GRAVELL, U.S. PRETRIAL SERVICES OFFICER:

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 Temecula, California on March 5, 2022. Assistant United States Attorneys Andrew R. Haden and Nicholas W. Pilchak were contacted and do 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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1 Mr. Magaña respectfully requests that he be permitted to travel to his sister's home
 2 in Temecula (Central District) with his son and surety-wife for a 50th birthday at his
 3 sister's home. With the Court's permission, he will travel on Saturday, March 5, 2022
 4 for a day trip.

5 Magaña remains entirely compliant with all his bond conditions and has
 6 demonstrated his trustworthiness while on pretrial release. He will provide additional
 7 details of this travel, including his sister's address, to his pretrial services officer and will
 8 keep her informed if there are any changes. Mr. Magaña will also contact Officer Arvayo
 9 to check in before leaving and immediately upon his return home to the Southern
 10 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 Temecula, California on March 5, 2022.

14 Respectfully submitted,

15 Date: February 24, 2022

16 /s/ Ezekiel E. Cortez
 17 Ezekiel E. Cortez
 18 Attorney for Defendant,
 19 Fred Magaña

20 /s/ Andrew R. Haden (by consent)
 21 Andrew R. Haden
 22 Assistant U.S. Attorney
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