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4 Attorney for Defendant  
5 Moses Onciu

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8 UNITED STATES DISTRICT COURT  
9 CENTRAL DISTRICT OF CALIFORNIA  
10 SOUTHERN DIVISION

11  
12 UNITED STATES OF AMERICA, ) Case No. SA CR 08-180-DOC  
13 Plaintiff, )  
14 v. ) STIPULATION MODIFYING  
15 MOSES ONCIU, et al., ) CONDITIONS OF RELEASE FOR  
16 Defendants. ) DEFENDANT MOSES ONCIU

17 Plaintiff United States of America, by and through its  
18 counsel of record, the United States Attorney for the Central  
19 District of California, and defendant Moses Onciu, by and through  
20 his counsel of record, Gerald Werksman, stipulate as follows.

21 1. Defendant Onciu first appeared before a judicial  
22 officer in the court in which this charge is pending on August 4,  
23 2008. Defendant was released on bail and has been supervised by  
24 United States Pretrial Services ("USPTS"). Defendant has  
25 appeared for all court proceedings as directed. The USPTS  
26 officers who have been supervising defendant have stated that  
27 defendant has complied with the terms of pretrial release.

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1           2.     This case is currently set for trial on October 15,  
2 2013. Defendant has requested that pretrial supervision be  
3 discontinued and that he be allowed additional travel beyond that  
4 permitted by the conditions of release in effect. Both USPTS  
5 Officer Chris D'Antonio, who has supervised defendant in Arizona,  
6 and USPTS Officer Ada O'Neill, who is overseeing the case in this  
7 district, have stated that they have no objection to  
8 discontinuing pretrial supervision and that they believe that  
9 such an order would be appropriate for defendant Onciu.

10           3.     Defendant would like to be permitted to travel within  
11 the United States without restriction. Defendant also would like  
12 to be permitted to seek leave of court when and if he has a need  
13 to travel internationally. If defendant seeks permission for an  
14 international trip, he shall file a request with the court and  
15 provide details regarding his travel itinerary. In order to  
16 allow such travel, defendant requests that his current passports  
17 be returned to him so that they may be renewed. USPTS stated  
18 that it does not object to these modifications.

19           4.     In view of USPTS' position that supervision may be  
20 discontinued and that the requested modifications to the terms of  
21 release may be made and defendant's appearances and compliance

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1 with terms of release, the government does not object to the  
2 requested modifications.

3 IT IS SO STIPULATED.

4 Dated: April 10, 2013.

5 ANDRÉ BIROTTE JR.  
United States Attorney

6 DENNISE D. WILLETT  
Assistant United States Attorney  
7 Chief, Santa Ana Branch

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LAWRENCE E. KOLE\*  
Assistant United States Attorney  
\*per telephonic authorization

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12 Attorneys for Plaintiff United  
States of America

13 Dated: April 10, 2013.

14 /S/

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GERALD WERKSMAN

16 Attorney for Defendant  
17 Moses Onciu

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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,	)	Case No. SA CR 08-180-DOC
	)	
Plaintiff,	)	[PROPOSED] ORDER MODIFYING
	)	CONDITIONS OF RELEASE FOR
v.	)	DEFENDANT MOSES ONCIU
	)	
MOSES ONCIU, <u>et al.</u> ,	)	
	)	
Defendants.	)	
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The Court has read and considered the stipulation to modify conditions of pretrial release for defendant Moses Onciu filed by the parties in this matter on April 10, 2013. For the reasons set forth in the stipulation, the Court hereby modifies defendant's conditions of release as follows.

FOR GOOD CAUSE SHOWN, IT IS ORDERED THAT:

1. Pretrial supervision is discontinued for defendant Onciu.
2. Defendant Onciu's permitted travel is modified so that he may travel within the United States.

1           3. Defendant Onciu may seek leave of Court to travel  
2 internationally on a particular occasion. Defendant shall file a  
3 request with the Court for any such trip and provide details  
4 regarding his travel itinerary.

5           4. Defendant Onciu's current passports shall be returned  
6 to him by United States Pretrial Services.

7 Dated: \_\_\_\_\_.

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Honorable David O. Carter  
United States District Judge

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