

1 Gerald M. Werksman, State Bar # 145020
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2 Newport Beach, CA 92663
Telephone:(949)675-5179

3 UNITED STATES DISTRICT COURT
4 FOR THE CENTRAL DISTRICT OF CALIFORNIA
5 SOUTHERN DIVISION
6

7 UNITED STATES of AMERICA,) Case No.: SA CR 08-180-DOC
8 Plaintiff,)
9 v.)
10 MOSES ONCIU, et al)
11 Defendants)
12 _____)
13

14 MOTION of DEFENDANT MOSES ONCIU TO MODIFY HIS BOND TO
15 ALLOW TRAVEL TO INDIA AND TO SAN DIEGO
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17 Now comes the Defendant, Moses Onciu, by his attorney, Gerald M. Werksman, and
18 moves this court for an order (1) allowing him to travel to India to participate in religious
19 ceremonies from November 19, 2008, and December 11, 2008 and (2) to allow him to visit his
20 daughter in San Diego, California on an ongoing basis, and in support thereof, states as
21 follows;

- 22
- 23 1. Defendant is presently limited by the bond restrictions to Arizona and the
24 Central District of California.
 - 25 2. Defendant would like permission to go to India for several religious meetings as set
26 forth in the attached letters. As can be seen in the attached documents,. Defendant is
27 active in the Hope Ministries and had been invited to participate in religious
28 meetings in India from November 20th to December 11, 2008.
 3. Defendant's daughter lives and works in Oceanside, California. He would like

1 permission to visit her on an ongoing basis.

- 2
- 3 4. Defendant voluntarily surrendered at the time an arrest warrant was issued. Earlier,
- 4 he returned from a business trip to Hong Kong when the FBI wished to talk to
- 5 him. He is in an American Citizen and resides with his wife in Arizona.

6 WHEREFORE, for the foregoing reasons, defendant moves this court for an order to:

- 7 1) Allowing defendant to participate in religious ceremonies in India from November
- 8 18 to December 20, 2008,
- 9 2) Allowing defendant to visit his daughter in San Diego on an ongoing basis.

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11 Respectfully submitted,

12 

13 Gerald M. Werksman

Dear Mr. Werksman,

Please find enclosed the letter of request for me to travel to India for the planned crusades between the 20th of November and the 12th of December.

We have already conducted one crusade and one Pastor's conference by Skype/Phone but now I need to be able to go physically to India and minister with our team as we had planned. I am not sure what needs to be done to make this a possibility but I would like to ask your help in proceeding.

As you know, I came back from Hong Kong to face these charges. I am not a flight risk and I have put up the bond as requested. It has been very difficult for me to continue to minister and work with the restrictions placed on my travel but I have not complained. However, I am a minister and as such need to be able to perform my ministerial duties as required for our assemblies.

Please petition the court to release me to travel during these times so that I may fulfill my duties. I am available to meet with you this week but must be in Phoenix on Wednesday for my appointment with pre trial services.

I have enclosed the letter from our Bishop in India and several photos of our ministry work in India where we desire to travel.

Thank you.



Dr. Moses Onciu

Schedule enclosed below:

Your Meeting Schedule in India

1. Arrival in India - November 18.
2. Meeting with local church leaders and community leaders - November 19 - 21.
3. Crusade meetings in Machilipatnam - November 22 - 24
4. 250 Pastors Conference Meetings in Vijaywada - November 27 - 30
5. Visit Mary Onciu Children's Home - December 1- 2
6. Inauguration of New Hope Ministries Church in Teipuranthakam Praksham District AP -December 3-5.
7. Tour of local areas of interest - December 6-10
8. Meet with government officials for Bible school authority presentation December 11
9. Return to USA December 12.

"And said unto them, Go ye into all the world, and preach the gospel to every creature." Mark 16:15



New Hope Ministries (India)

న్యూ హోప్ మినిస్ట్రీస్ ఇండియా

India Head Quarters :- Plot No. 109, Saraswathi Nagar Colony, Lothukunta, Secunderabad,

A.P. INDIA 500015. Cell : 9392105639, 9849304881

www.dayana.ophans.org

Rev. Dr. S. HENRY DEVADAS DD

Presiding Bishop of India

President & Founder of New Hope Ministries INDIA

REGD. No. 371/2008

GOVERNING BODY

Rev. Dr. Moses Onciu

Presiding Head Bishop

Rev. Mary Kathryn Onciu

International Women's Director

Bishop Sima Onciu, DD

Board Member

Bro. Cornel Mathu, Sr.

Vice President of DGM and

Founder of "SPERANTA (HOPE)"

EXECUTIVE MEMBERS

Mrs. S. Sakami MPHW

Vice President

Bro. S. Solomon Raj B.Com.

Secretary

Pastor M. Moses BA

Joint Secretary

Pastor. N. Ramana Army RTD.

Treasurer

AIMS & OBJECTIVES

1. To Equip Pastors in India
2. To Share the Good News Through Good Works
3. To Build Bible College
4. To Construct 200 bedded Super Speciality New Hope Hospital
5. To build Mercy Orphans Homes in India
6. To Build Churches in India
7. To construct New Hope Complex in India
8. To Conduct free medical camps for poor and needy people
9. Relief Food, Hunger, Tsunami, Earthquake any were in India.

Greetings to you in the name of our Lord Jesus Christ

To,
Bishop Moses Onciu
International Presiding Bishop
Hope Ministries
16741 E Westby Dr., Suite 103
Fountain Hills, Arizona 85268-

I hope you are doing well. It is really a great privilege for me and also my pastors to finally meet with you in person in India. We have been waiting for your arrival for several months and were saddened to have to conduct the last pastor's conference with you by telephone. But, Praise God, even through the phone your prayers were heard in heaven and several people were healed, demons were cast out and many came to the Lord.

We do not understand how they can keep you from working in your calling if you have not been found guilty of anything and we have continued with our planned crusade on November 21-30 in anticipation of your arrival here to conduct the crusade with us. We know that God will make a way for you to be here as planned. Many pastors and congregations are praying for you!

I understand that you, Sister Mary and your ministry team need an official invitation for your visas and so we send this letter to you. We have arranged the below schedule to maximize your time with us and would be pleased to minister with you as long as the courts in America will allow you to spend with us in this crusade. We are praying diligently that you and your wife will be allowed to come in person this time.

We need you here. Our pastors are waiting for you to ordain them for the ministry and to commission them for the crusade. We are anxious for you to come and minister to our pastors and congregation. We have been praying for your arrival and looking forward to God's move

Plot No. 109, Saraswathi Nagar Colony, Lothukunta, Secunderabad - 500015, Andhra Pradesh, INDIA.

Ph : 0091-9849304881, 0091-9392105639 E-Mail : newhopeinindia@gmail.com

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6. To Build Churches in India
7. To construct New Hope Campus in India
8. To Conduct free medical camps for poor and needy people
9. Relief Food, Hunger, Tsunami, Earthquake any where in India.

through this crusade. We anticipate more miracles when you arrive and are preparing the local congregations and community leaders for your arrival.

Please let me know what to do as soon as you can. I will continue to pray for your deliverance and for your arrival here as we had planned. We look forward to your vindication and release to the ministry God has called you to. Your presence is very important to us because you are the main speaker in these meetings. So please accept our Invitation. We are praying for you and we will look forward to see you soon in India.

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9. Return to USA December 12.

Yours truly in Christ

Rev. Henry Devadas

BISHOP, S. HENRY DEVADAS D.D.

Presiding Bishop of India

New Hope Ministries India

Plot No. 109, Saraswathi Nagar Colony, Lothukunta, Sec 9& 15, A.P. India.



1 Gerald M. Werksman, State Bar # 145020
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Telephone: (949) 6755179

3 Attorney for Defendant
4 Moses Onciu

5 UNITED STATES DISTRICT COURT
6 CENTRAL DISTRICT OF CALIFORNIA
7 SOUTHERN DIVISION

8 UNITED STATES OF AMERICA,)	Case No.: SA CR 08180-DOC
9 Plaintiff,)	ORDER MODIFYING
10 v.)	TERMS SUPERVISED
11 MOSES ONCIU)	RELEASE FOR
Defendant)	DEFENDANT MOSES
)	ONCIU

12
13 This matter having come before in the motion of the defendant, and the court having been
14 fully advised, IT IS ORDERED that defendant Moses Onciu

- 15 1. be allowed to go to India to attend religious ceremonies from November 20, to
- 16 December 11, 2008, and
- 17 2. be allowed to visit his daughter in San Diego on an ongoing basis.

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19 Dated: November 10, 2008

20 HONORABLE DAVID O. CARTER

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3 Attorney for Defendant
4 Moses Onciu

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11 UNITED STATES OF AMERICA,
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) TO MODIFY BOND TO ALLOW
) TRAVEL TO INDIA AND TO
) SAN DIEGO
) Hearing Date: Nov. 10, 2008
) Hearing Time: 1 PM

16

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NOTICE OF MOTION

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TO THE HONORABLE GARY A. FEESS AND TO THE ASSISTANT UNITED
20 STATES ATTORNEY LARRY KOLE:

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PLEASE TAKE NOTICE that on November 10, 2008, or as soon thereafter as may
be heard, Moses Onciu, by and through his counsel of record, Gerald Werksman, will
move this court for an order to enlarge Mr. Onciu's bond. You may appear if you so see
fit.


Gerald M. Werksman