

1 **Gerald Werksman, Esq. (State Bar No. 145020)**
2 **30 Wharfside Drive**
3 **Newport Beach, CA 92657**
4 **Telephone: (949) 675-5179**
5 **Facsimile: (949) 722-2727**
6 **Email: werksmanlaw@gmail.com**

7 Attorney for Defendant
8 Moses Onciu

9 **UNITED STATES DISTRICT COURT**
10 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
11 **SOUTHERN DIVISION**

12 UNITED STATES OF AMERICA)	CASE NO. SA CR 08-180-DOC
13 Plaintiff,)	STIPULATION REGARDING
14 v.)	PRETRIAL RELEASE
15 MOSES ONCIU,)	CONDITIONS FOR MOSES ONCIU
16 Defendant.)	AND [PROPOSED]
17 _____)	

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

22 1. Defendant Moses Onciu first appeared before the court in this case in
23 July, 2008. Since that time he has been free on a \$20,000.00 own recognizance bond
24 under the following conditions:

- 25 a. He reports twice a month to the Pre-Trial Office in Phoenix,
- 26 Arizona.
- 27 b. His travel is restricted to Arizona and the Central District of
- 28 California.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

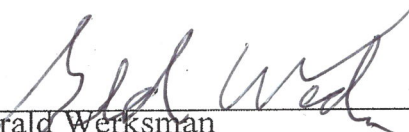
2. Mr. Onciu's present Pre-Trial Officer, Christopher S. Jantonio, (602) 322-7372, has informed counsel for Mr. Onciu that Defendant Onciu has faithfully complied with all conditions of release, and that it is Officer Jantonio's recommendation that Mr. Onciu no longer has to submit reports twice a month to Pre-Trial services. The parties agree that Mr. Onciu should report to Pre-Trial Services as directed by the Pre-Trial Services Officer.

3. Mr. Onciu also requests the court's permission that he be allowed to travel throughout the entire State of California and Nevada without further order of the court, to which the Government has no objection.

Therefore the government and defendant Onciu stipulate and agree to the modifications to the terms and conditions for Moses Onciu's pre-trial release.

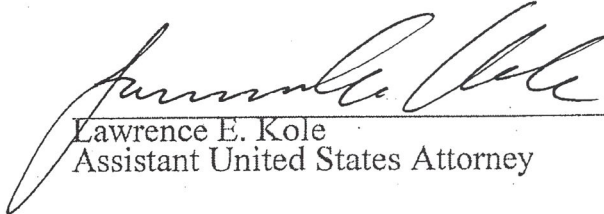
Dated: June 21, 2011

Respectfully submitted,



Gerald Werksman
Counsel for Moses Onciu

Dated: June 21, 2011



Lawrence E. Kole
Assistant United States Attorney

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Gerald Werksman, Esq. (State Bar No. 145020)
30 Wharfside Drive
Newport Beach, CA 92657
Telephone: (949) 675-5179
Facsimile: (949) 722-2727
Email: werksmanlaw@gmail.com

Attorney for Defendant
Moses Onciu

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

UNITED STATES OF AMERICA	}	CASE NO. SA CR 08-180-DOC
Plaintiff,	}	[PROPOSED] ORDER REGARDING PRETRIAL RELEASE CONDITIONS FOR MOSES ONCIU
v.	}	
MOSES ONCIU,	}	
Defendant.	}	

This matter having come before the court, the Stipulation of the parties having been read and considered, and the Court been fully informed,

It is hereby ordered that defendant Moses Onciu no longer has to report to Pre-Trial Services twice each month and, instead, shall report to Pre-Trial Services as directed by the Pre-Trial Services Officer, and is permitted to travel throughout the States of California, Nevada, and Arizona.

Dated: June ____, 2011

Honorable David O. Carter
United States District Judge