

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 vs.) Case No. 08-CR-00297-FJG
)
 STEFAN GUERRA,)
)
 Defendant.)
)

MOTION TO MODIFY TRAVEL RESTRICTIONS

Defendant Stefan Guerra moves for an order allowing him to travel to Puerto Rico for five days. The basis for his motion is set forth below.

1. Defendant has been on pretrial release since November 13, 2008. He entered a guilty plea on March 3, 2009. Sentencing is not anticipated until late 2009.
2. Judge Hays' release order dated November 13, 2008 restricts defendant's travel to the Kansas City Metropolitan area.
3. Defendant has been a model citizen while on pretrial release.
4. Defendant seeks to travel to Puerto Rico for vacation from July 2 through July 6, 2009. Defendant will provide Pretrial Services with a detailed itinerary of his flight, hotel and contact information.
5. Assistant U.S. Attorney Linda Marshall has been contacted and has no objection to this request.
6. Pretrial Service Officer Penney Hodges has been contacted and has no objection to this request.

For the reasons stated herein, defendant prays for an order allowing him to travel to Puerto Rico from July 2 through July 6, 2009.

Respectfully submitted,

BRADSHAW HERRINGTON, P.C.

BY: /s/ Daniel O. Herrington

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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was sent via ECF on the 17th day of March, 2009.

/s/ Daniel O. Herrington