

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No.12-06001-05-CR-W-GAF
	)	
CHRISTINA GONZALEZ,	)	
	)	
Defendant.	)	

**MOTION FOR RECONSIDERATION OF PRETRIAL RELEASE**

COMES NOW the defendant, Christina Gonzalez, and moves this Court for reconsideration of the Court's Order of detention pending trial. In support of this Motion, defendant states as follows:

**SUGGESTIONS IN SUPPORT**

1. On January 10, 2012, an indictment was filed charging defendant with conspiracy to transport illegal aliens, to unlawfully produce identification documents, to unlawfully transfer the means of identification of another person, and to commit social security fraud in violation of 18 U.S.C. § 371.
2. On January 12, 2012, the office of the Federal Public Defender was appointment to represent Ms. Gonzalez.
3. A detention hearing was held on January 17, 2012 and the Court found there was no conditions or combination of conditions that could reasonably assure the appearance of the defendant or the safety of the community.
4. One of the findings of fact entered by the Court was that defendant's state parole officer advised a parole violation report would be submitted and a no bond warrant would be issued

due to the alleged instant offense.

5. On February 9, 2012, Pretrial Services Officer Van Hecke confirmed that the state parole violation warrant has been withdrawn pending resolution of the federal case.

6. Ms. Hernandez requests the Court to reconsider it's detention Order.

7. Defendant Hernandez states that she is not a flight risk and not a danger to the community. Defendant will abide by all conditions of release.

WHEREFORE, for the reasons set forth herein, defendant Christina Hernandez moves this Court for an Order granting her release on bond during the pendency of this action with conditions that will assure the defendant's appearance at trial and safety of the community.

Respectfully submitted,

/s/ Anita L. Burns  
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COUNSEL FOR DEFENDANT

### **CERTIFICATE OF SERVICE**

In accordance with Rule 49(a), (b) and (d), Fed. R. Crim. P., and Rule 5(b), Fed. R. Civ. P., it is hereby CERTIFIED that one copy of the foregoing Motion was electronically mailed to Jess Michaelson, Assistant U.S. Attorney, 400 E. 9th St., 5th Floor, Kansas City, Missouri 64106, this 13th day of February, 2012.

/s/ Anita L. Burns  
Anita L. Burns

