

1 MCGREGOR W. SCOTT
United States Attorney
2 OWEN ROTH
Assistant United States Attorney
3 501 I Street, Suite 10-100
Sacramento, CA 95814
4 Telephone: (916) 554-2700
Facsimile: (916) 554-2900
5

6 Attorneys for Plaintiff
United States of America
7

8
9 IN THE UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,
12
13 Plaintiff,
14 v.
15 REGGIE PAJIMOLA,
16 Defendant.

CASE NO. 2:18-CR-010 TLN DB

STIPULATION AND PROPOSED ORDER TO
MODIFY TERMS OF SUPERVISED RELEASE

DATE: March 15, 2018
COURT: Hon. Deborah Barnes

17 The United States of America, through the undersigned Assistant U.S. Attorney, and counsel for
18 Reggie Pajimola hereby stipulate to the proposed temporary modification of the terms of Pretrial
19 Services supervision, and ask that the Court order the temporary modification. Pretrial Services has
20 reviewed the proposed conditions and defers to the Court's judgment on whether to approve the
21 temporary modification. In support of the request and the proposed order, these parties represent the
22 following.

23 Mr. Pajimola is a defendant in Case No. 2:18-cr-010 TLN. Per an earlier order of this Court, he
24 is presently out of custody on terms of Pretrial Services supervision. Mr. Pajimola is in compliance with
25 the terms of his supervision; those terms generally limit his travel to the Eastern District of California.

26 Through his counsel, Mr. Pajimola has informed the Government that he would like to
27 accompany his wife on a trip to Guadalajara, Mexico, so that they can visit her ailing grandmother. The
28 Government does not object to the request. Accordingly, the parties request that the conditions of Mr.

Pajimola's Pretrial Services supervision be temporarily modified as follows, to permit the travel:

1. On April 6, 2018, Mr. Pajimola may travel with his wife on Aeromexico Flight 789 from Sacramento, California, to Guadalajara, Mexico.
2. Mr. Pajimola may obtain his passport from Pretrial Services within 48 hours of his departure on April 6.
3. From April 6 to April 13, Mr. Pajimola shall temporarily reside in Guadalajara. Specifically, he shall stay at the home of his wife's aunt, at a specific residence within Guadalajara. The names of Mr. Pajimola's wife and her aunt, and the location of the specific residence, shall be provided to Pretrial Services in advance of this trip. During the noted time period, Mr. Pajimola may not reside at any location other than the specific residence provided to Pretrial Services, and he may not travel outside the city of Guadalajara.
4. During the time period of April 6 through April 13, Pretrial Services shall be able to contact Mr. Pajimola at phone numbers that he shall provide before departing.
5. On April 13, Mr. Pajimola shall return from Guadalajara to Sacramento, California, on Aeromexico Flight 788. He shall surrender his passport to Pretrial Services within 24 hours of his return.
6. During the time period that Mr. Pajimola is traveling, all other conditions of his Pretrial Services supervision shall remain in effect as though he were present in the Eastern District of California. For example, he may not commit any act that would constitute a violation of federal, state, or local law in the Eastern District of California, and he must continue to abide by the Special Conditions that were imposed by the Court.
7. Mr. Pajimola may make reasonable changes to his flight plans if unforeseen contingencies arise, subject to the approval of the Pretrial Services Officer. For example, he may change flights on the noted days of travel if excessive delays occur on the flights noted in this stipulation. Any such changes must be approved by the Pretrial Services Officer in advance, if at all feasible; and must be reported to the Pretrial Services Officer as soon as possible if they occur before she is notified. Pretrial Services shall have the discretion to determine if Mr. Pajimola has made reasonable alterations to his flight plans or has improperly deviated from the conditions set forth

1 in this stipulation.

2 8. Upon Mr. Pajimola's return to the Eastern District of California, all exceptions to the conditions
3 of Pretrial Services supervision set forth in this stipulation shall lapse. The conditions previously
4 imposed by the Court shall thereafter apply as if no temporary modification had occurred.

5 The parties request that all other terms and conditions of supervision for Mr. Pajimola otherwise
6 remain in full force and effect. See Dkt. No. 18, 2:18-cr-010 TLN. Further, nothing in this stipulation
7 and proposed order affects any terms or conditions of any other person's terms of supervision.

8
9 Dated: March 15, 2018

McGREGOR W. SCOTT
United States Attorney

10
11 By: /s/ OWEN ROTH
12 OWEN ROTH
Assistant United States Attorney

13 Dated: March 15, 2018


14 By: /s/
15 CANDICE FIELDS
Counsel for Reggie Pajimola

16
17 **ORDER**

18 The Court, having reviewed the aforementioned stipulation and finding that good cause has been
19 shown, orders the temporary modification of the conditions of Pretrial Services supervision applicable to
20 Reggie Pajimola, and adopts the proposed temporary conditions in the stipulation. All other terms and
21 conditions of release applicable to Mr. Pajimola (Dkt. No. 10, 2:18-cr-010 TLN) remain in effect.

22 **SO ORDERED.**

23 Dated: March 15, 2018

24
25 
26 DEBORAH BARNES
27 UNITED STATES MAGISTRATE JUDGE
28