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

11 UNITED STATES OF AMERICA,  
12  
Plaintiff,  
13  
v.  
14 EDGAR JIMENEZ and BRENDA MIRANDA,  
15  
Defendants.  
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CASE NOS. 2:18-CR-010 TLN  
2:17-CR-234 TLN

STIPULATION AND ~~PROPOSED~~ ORDER TO  
MODIFY TERMS OF SUPERVISED RELEASE

DATE: March 1, 2018  
COURT: Hon. Edmund F. Brennan

17 The United States of America, through the undersigned Assistant U.S. Attorney, and counsel for  
18 Edgar Jimenez and Brenda Miranda hereby stipulate to the proposed modification of a term of  
19 supervised release for these two defendants, and ask that the Court order the modification. In support of  
20 the request and the proposed order, these parties represent the following.

21 Mr. Jimenez and Ms. Miranda are defendants in two indictments arising from a common  
22 investigation; Mr. Jimenez is a defendant in Case No. 2:18-cr-010 TLN, and Ms. Miranda is a defendant  
23 in Case No. 2:17-cr-234 TLN. Per earlier orders of this Court, these defendants are participating in  
24 residential treatment at the Wellspace Residential Treatment Program (“Wellspace”). Further, both  
25 defendants are subject to a special condition of release – generally imposed on all out-of-custody  
26 defendants in the indictments arising from the investigation – that they not have contact with any  
27 witness or co-defendant. Specifically, Special Condition 10 for Mr. Jimenez provides that he shall not  
28 “associate or have any contact with co-defendants unless in the presence of counsel or otherwise

1 approved in advance by the pre-trial services officer.” Similarly, Special Condition 10 for Ms. Miranda  
2 provides that she shall not “associate or have any contact with any co-defendants or related case  
3 defendants unless in the presence of counsel or otherwise approved in advance by the pretrial services  
4 officer.” In practice, all defendants in the various related cases are prohibited from having contact with  
5 anyone on a sixty-one person list that the Government has provided to Pretrial Services, which in turn  
6 has provided it to all counsel.

7 At present, the Special Conditions noted in this stipulation may create an impediment to the  
8 treatment that Mr. Jimenez and Ms. Miranda are now receiving at Wellspace. The parties understand  
9 that these defendants may participate in treatment programs together, and that they may have ordinary,  
10 incidental contact due to the size of the facility and their mutual residence there. For this reason, the  
11 parties now propose the following modification to Special Conditions 10 for both defendants:

12 You must not associate or have any contact with any co-defendants,  
13 related case defendants, witnesses or other identified individuals as  
14 directed by the Pretrial Services Officer unless in the presence of counsel  
15 or otherwise approved in advance by the Pretrial Services Officer;  
16 provided, however, that Edgar Jimenez and Brenda Miranda may  
17 communicate with each other about matters reasonably related to the  
purpose of their receiving treatment at the Wellspace Residential  
Treatment Program (“Wellspace”) during that time that both individuals  
are residing at Wellspace, and may have those ordinary brief interactions  
that may arise from the fact of their both residing at Wellspace, but about  
no other matters.

18 The parties request that all other terms and conditions of release for these defendants remain in  
19 full force and effect. See Dkt. No. 18, 2:18-cr-010 TLN; Dkt. No. 47, 2:17-cr-234 TLN. Further,  
20 nothing in this stipulation and proposed order affects any terms or conditions of any other person’s terms  
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of supervised release.

Dated: March 1, 2018

McGREGOR W. SCOTT  
United States Attorney

By: /s/ OWEN ROTH  
OWEN ROTH  
Assistant United States Attorney

Dated: March 1, 2018

By: /s/ TODD LERAS  
TODD LERAS  
Counsel for Edgar Jimenez

Dated: March 1, 2018

By: /s/ J. TONEY  
J. TONEY  
Counsel for Brenda Miranda


**[PROPOSED] ORDER**

The Court, having reviewed the aforementioned stipulation and finding that good cause has been shown, orders the modification of Special Conditions 10 applicable to Edgar Jimenez and Brenda Miranda, and adopts the proposed modified condition in the stipulation. All other terms and conditions of release applicable to Mr. Jimenez (Dkt. No. 10, 2:18-cr-010 TLN) and Ms. Miranda (Dkt. No. 47, 2:17-cr-234 TLN) remain in full force and effect.

In light of this stipulation and order, the earlier submission found at Docket Number 50, Case No. 2:17-cr-234 TLN, is stricken.

**SO ORDERED.**

Dated: March 2, 2018

  
Edmund F. Brennan  
United States Magistrate Judge