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5 Attorney for Defendant MARK HARRIS

6 UNITED STATES DISTRICT COURT
7 CENTRAL DISTRICT OF CALIFORNIA
8

9 UNITED STATES OF AMERICA,) Case Nos.: 2:13-cr-00048-SVW
10) 2:13-cr-00062-SVW

11 Plaintiff,)

12 vs.)

13 REGIS POSSINO, et al.)

14 Defendants.)

) **STIPULATION TO MODIFY**
) **CONDITIONS OF PRETRIAL**
) **RELEASE FOR DEFENDANT**
) **MARK HARRIS**

) [PROPOSED ORDER LODGED
) CONCURRENTLY HEREWITH]

16 UNITED STATES OF AMERICA,)

17 Plaintiff,)

18 vs.)

19 SHERMAN MAZUR, et al.)

20 Defendants.)
21)
22)

23 Plaintiff United States of America, by and through its counsel of record,
24 Assistant United States Attorneys James A. Bowman, Peter W. Baldwin and Ariel
25 A. Neuman, and defendant Mark Harris ("Harris"), by and through his counsel of
26 record, Steven M. Goldsobel, hereby stipulate as follows:
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1 1. On February 27, 2013, the Court ordered Mr. Harris's pretrial release
2 subject to certain conditions. The Court modified Mr. Harris's pretrial release
3 conditions on April 9, 2013 and June 20, 2013. Mr. Harris currently is subject to
4 electronic monitoring and his travel is restricted to the District of Arizona and the
5 Central District of California.¹

6 2. On June 24, 2013, Mr. Harris pleaded guilty to Count One of the
7 indictment in *United States v. Possino, et al.*, Case No. 2:13-cr-00048-SVW,
8 pursuant to a plea agreement. It is anticipated that Mr. Harris will not be sentenced
9 until after the conclusion of the second of two trials, the second of which is *United*
10 *States v. Mazur, et al.*, Case No. 2:13-cr-00062-SVW, and is scheduled to begin
11 on June 17, 2014. Accordingly, Mr. Harris will continue on pretrial release for a
12 substantial period of time.

13 3. Mr. Harris has been driving from Arizona to Los Angeles, California
14 for court appearances and to meet with his counsel. The parties agree that it will
15 be substantially less burdensome if Mr. Harris can travel by plane and,
16 accordingly, should no longer be subject to electronic monitoring. Counsel for
17 Mr. Harris has conferred with Mr. Harris's Pretrial Services Officer in Los
18 Angeles who is not opposed to the removal of electronic monitoring.

19 4. Mr. Harris also has family in the Southern District of California and
20 desires to travel throughout California. Mr. Harris's Pretrial Services Officer is
21 not opposed to amending Mr. Harris's travel so that he may travel throughout
22 California and Arizona. In addition, Pretrial Services is not opposed to permitting
23 Mr. Harris to travel throughout the United States with the approval of Pretrial
24 Services and the government. To the extent Mr. Harris desires to travel outside
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27 ¹An identical copy of this Stipulation and the concurrently lodged [Proposed] Order have been
28 filed in both the *Possino* and *Mazur* matters.

1 the United States, Pretrial Services will provide Mr. Harris with his passport upon
2 receipt of a court order authorizing such international travel with his passport.

3 5. Accordingly, the parties propose the following modifications as set
4 forth in the concurrently lodged proposed order:

5 a. Mr. Harris no longer shall be subject to electronic monitoring;

6 b. Mr. Harris may travel throughout Arizona and California;

7 c. Mr. Harris may travel throughout the United States with the prior
8 approval of the government and Pretrial Services;

9 d. To the extent Mr. Harris seeks to travel outside the United States, he
10 will apply for a court order authorizing such travel and for the release his passport
11 by Pretrial Services;

12 e. Mr. Harris may enter airports and railroad and bus terminals for
13 travel authorized herein; and

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1 f. All other conditions of release shall remain as originally ordered
2 except as previously modified.

3 IT IS SO STIPULATED.

4 Respectfully submitted,

5 Dated: June 27, 2013

LAW OFFICE OF STEVEN M. GOLDSOBEL

7
8 By: _____ /s/
9 STEVEN M. GOLDSOBEL
Attorney for Defendant MARK HARRIS

10 Dated: June 27, 2013

ANDRE BIROTTE, JR.
UNITED STATES ATTORNEY

12 By: _____ /s/
13 Ariel A. Neuman
14 James A. Bowman
15 Peter W. Baldwin
16 Assistant United States Attorneys
17 Attorneys for Plaintiff UNITED STATES
18 OF AMERICA
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