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9 Attorneys for Defendant  
10 MICHAEL T. SAHLBACH  
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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
MICHAEL T. SAHLBACH,  
Defendant.

Case No: 14-CR-0118 GEB

**STIPULATION AND [PROPOSED]  
AMENDED ORDER MODIFYING  
CONDITIONS OF PRETRIAL RELEASE**

The defendant, MICHAEL T. SAHLBACH, through his counsel, Malcolm S. Segal, and plaintiff United States of America, through its counsel, Assistant United States Attorney Jared Dolan, stipulate to modification of the travel conditions associated with the defendant's pretrial release, as set forth below. The proposed modifications are intended to adjust and authorize the defendant's travel to San Diego, California for medical examination and treatment in order to accommodate a change in the availability of his physicians and operating facilities.

The defendant was charged with bank and wire fraud in an Indictment filed on May 1, 2014, appeared and was arraigned the next day and released on a \$600,000 secured appearance bond and a \$100,000 cash bond. The defendant's pretrial release is subject to pretrial supervision by Pretrial Services. The conditions of release include a travel restriction, limiting the defendant's travel to the Eastern District of California, unless he obtains prior approval from the Pretrial Services Officer, a curfew subject to modification by Pretrial Services and location monitoring. This Court has approved previous modifications of the conditions of release, including travel for medical purposes.

Although the parties are in agreement that the travel should be permitted and have so stipulated, the modification of the Special Conditions of Release requiring location monitoring requires an Order authorizing Pretrial Services to exercise its discretion to modify or discontinue the monitoring for purposes of travel or medical treatment.

The Pretrial Services Officer has been advised of the nature of the defendant's medical condition, the name of the defendant's physician and the medical facility at which the care will be provided. The schedule for travel, the medical procedure and immediate after care and monitoring is as follows:

## Medical Procedure:

**Electronic monitoring removed on Wednesday afternoon 9-17-14;  
Travel on Thursday 9-18-14;  
Pre- Procedure examination Friday 9-19-14;  
Hospital Procedure Monday 9-22-14;  
Post-Procedure rest Tuesday 9-23-14;  
Travel to Sacramento Wednesday 9-25-14;  
and, Reattachment of monitoring by 12:00 PM Thursday 9-26-14.**

For the reasons set forth herein above, and based on information made known to Pretrial Services, the parties stipulate to the following:

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1           The conditions of the defendant's pretrial release shall be modified to  
2 permit his travel to San Diego, California to secure medical treatment in  
3 accordance with the referenced schedule. Pretrial Services may modify or  
4 discontinue electronic monitoring to facilitate the travel and medical treatment  
5 described above on September 17, 2014, and shall reinstall it by noon on  
6 September 26, 2014, or as soon thereafter as can reasonably be accommodated  
7 by PreTrial Services. PreTrial Services at its discretion may adjust the travel and  
8 monitoring schedule to accommodate any unanticipated changes in the  
9 appointments and need for medical care.

10           IT IS SO STIPULATED.

11           Dated: August 18, 2014

12           Respectfully submitted,

13           **SEGAL & ASSOCIATES, PC**

14           By: /s/ Malcolm Segal

15           MALCOLM SEGAL

16           Attorneys for Defendant

17           Dated: August 18, 2014

18           Respectfully submitted,

19           Benjamin B. Wagner

20           United States Attorney

21           Eastern District of California

22           By: /s/ Jared Dolan (by permission)

23           JARED DOLAN

24           Assistant United States Attorney

## **ORDER**

Upon the stipulation of the parties, and good cause appearing therefore,  
**IT IS ORDERED THAT:**

The conditions of the defendant's pretrial release shall be amended and modified to permit his travel to San Diego, California to secure medical treatment in accordance with the referenced schedule. Pretrial Services may modify or discontinue electronic monitoring to facilitate the travel and medical treatment described above on September 17, 2014, and shall reinstall it on September 26, 2014, or as soon thereafter as can reasonably be accommodated by PreTrial Services. PreTrial Services at its discretion may adjust the schedule to accommodate any unanticipated changes in the appointments and need for medical care.

All other conditions and previous modifications to the conditions of release shall remain unchanged.

IT IS SO ORDERED.

Dated: August 19, 2014

GARLAND E. BURRELL, JR.  
Senior United States District Judge