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UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

United States of America,	)	CR-17-0585-02-PHX-JJT
	)	
Plaintiff,	)	<b>DEFENDANT PETER STEINMETZ'</b>
	)	<b>MOTION FOR PERMISSION TO</b>
v.	)	<b>TRAVEL TO PINETOP, ARIZONA</b>
	)	<b>AND UNOPPOSED MOTION TO</b>
Peter Nathan Steinmetz, et al.,	)	<b>MODIFY CONDITIONS OF RELEASE</b>
	)	
Defendant.	)	(First Request)
	)	

Defendant Peter Steinmetz, though undersigned counsel, respectfully requests that his conditions of release be modified from home detention to curfew, at the discretion of Pretrial Services. Additionally, Dr. Steinmetz requests that this Court issue an order authorizing him to travel to Pinetop, Arizona from July 16, 2017 through July 22, 2017. Dr. Steinmetz wishes to travel to Pinetop, Arizona so he can take a prepaid vacation with his wife and son. Planning and payment for the Pinetop trip were made well in advance of the indictment of Dr. Steinmetz on June 20, 2017 on counts relating to money transmitting. The allegations in the indictment do not allege that travel had anything to do with the charges.

Undersigned counsel has spoken with Gilbert Lara of U.S. Pretrial Services, as well as AUSA Carolina Escalante Konti. Neither Mr. Lara nor Ms. Escalante Konti object to Dr. Steinmetz' request to modify his conditions of release. With respect to Dr.

1 Steinmetz's desire to travel to Pinetop, Arizona, Mr. Lara advised that he does not object  
2 if and only if, subject to the Court's approval, Dr. Steinmetz is required to call in to  
3 Pretrial Services every day. Because GPS monitoring is not consistently reliable in  
4 Pinetop, in the absence of this condition Mr. Lara would object. AUSA Escalante Konti  
5 advised that due to the inability to monitor Dr. Steinmetz while in Pinetop, she objects to  
6 Dr. Steinmetz being allowed to travel to Pinetop, Arizona for the time period requested.

7 It is expected that excludable delay under Title 18 U.S.C. § 3161(h)(7)(B)(i) and  
8 (iv) may occur as a result of this motion or from an order based thereon.

9 RESPECTFULLY SUBMITTED on July 12, 2017.

10 MITCHELL | STEIN | CAREY, PC

11 By: /s/ Lee Stein

12 Lee Stein

13 Attorneys for Defendant

14 I certify that on July 12, 2017, I electronically transmitted a PDF version of this  
15 document to the Clerk of Court, using the CM/ECF System, for filing and for transmittal  
16 of a Notice of Electronic Filing to the following CM/ECF registrants:

17 Clerk's Office  
18 United States District Court  
19 Sandra Day O'Connor Courthouse  
20 401 W. Washington  
21 Phoenix, Arizona 85003

22 Carolina Escalante Konti  
23 Matthew Binford  
24 Assistant U.S. Attorneys  
25 Two Renaissance Square  
26 40 North Central Avenue, Suite 1200  
27 Phoenix, AZ 85004  
28 Attorneys for Plaintiff

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1 COPY mailed on July 12, 2017, to:

2 Gilbert R. Lara  
3 U.S. Pretrial Services  
4 401 W. Washington, SPC 260  
5 Phoenix, AZ 85003

6 /s/ B. Wolcott  
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