

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 4:24-cr-00029-BP-3
	)	
DENISE SANDERS,	)	
	)	
Defendant.	)	
	)	

**DEFENDANT’S MOTION TO MODIFY RELEASE CONDITIONS
WITH DECLARATION OF COUNSEL**

Denise Sanders, through undersigned counsel, Paul Hood, respectfully moves the Court for an Order modifying pretrial release conditions to permit the Defendant to travel to the Western District of Missouri with the prior approval of her Pretrial Services Officer. The Government does not oppose this request. The United States Pretrial Services Office also does not oppose this request. Ms. Sanders resides in Texas and is supervised there. She is currently permitted to travel to the Western District of Missouri for Court or attorney meetings only.

Ms. Sanders was arraigned on February 29, 2024. ECF Doc. 46. She has no prior criminal history. ECF Doc. 41 at 4. The Government did not seek detention. Ms. Sander was continued on pretrial release with conditions that had been previously ordered by the United States District Court for the District of Texas. Those conditions limit Ms. Sanders’s travel to the “Western & Northern District of Texas and directly to and from the Western District of Missouri for Court or consultation with counsel.” ECF Doc. 28 at 2 (condition 7f).

Ms. Sanders respectfully moves this Court to modify the previously cited travel restriction by adding these words to the end of the condition, “or as otherwise pre-approved by Pretrial Services.” If modified as requested, the full condition from 7f would read as follows:

Abide by the following restrictions on personal association, residence, or travel: Western & Northern District of Texas and directly to and from the Western District of Missouri for Court or consultation with your counsel or as otherwise pre-approved by Pretrial Services.

Ms. Sanders has significant connections to Kansas City and the Kansas City-area, including family who live here. The requested modification would allow Ms. Sanders to travel to Kansas City and the Kansas City-area so long as the Pretrial Services Office approved of the travel in advance. This request arose because Ms. Sanders will soon need to travel to Kansas City for a funeral. In consultation with the US Pretrial Services, the relief requested by this motion is tailored not just to that anticipated trip but to address travel needs more generally based on Ms. Sanders connections to this area. This request is supported by the following declaration of counsel:

DECLARATION

I, Paul Hood, declare under of penalty of perjury that the following is true to the best of knowledge and belief:

1. I am the attorney for Denise Sanders in this matter.
2. On March 13, 2024, she contacted me regarding a request to travel to Kansas City, Missouri.
3. Ms. Sanders’s husband has a serious medical condition and is near the end of his life.
4. Her husband was recently removed from a ventilator and is not expected to live much longer.

5. His funeral will be in Kansas City.
6. Ms. Sanders had also contacted Wayne Webb, her Supervising Pretrial Services Officer in Texas, regarding the situation.
7. On March 14, 2024, I conferred with Tanis Humig with United States Pretrial Services in Kansas City, MO.
8. The Pretrial Services Office in Kansas City does not object to this motion.
9. The Pretrial Services Office in Texas also does not object to this motion.
10. On March 14, 2024, I also conferred with Assistant United States Attorney Paul Becker regarding this motion, including a description of the relief requested and the supporting rationale.
11. The Government does not oppose this motion.
12. Ms. Sanders is sixty years old and has no criminal history.

CONCLUSION

Release conditions are to be no more restrictive than is necessary to meet two goals: safety and the appearance of the accused at court dates. 18 U.S.C. § 3142(c)(1)(B). Both of those goals can be met while allowing Ms. Sanders to travel to the Western District of Missouri for Court, attorney meetings, and for other purposes with the pre-approval of United States Pretrial Services. For the reasons stated, the requested relief should be granted.

Respectfully submitted,

s/ Paul Hood

PAUL HOOD, MO 55215

104 W. 9th Street, Suite 404

Kansas City, MO 64105

Phone: 541-513-7545

Fax: 844-284-3964

paul@paulhoodlaw.com

Attorney for Denise Sanders

Certificate of Service

The undersigned certifies that the foregoing motion was electronically filed on March 14, 2024 and that service was accomplished through Notice of Electronic Filing to counsel for the Government and counsel for co-defendants.

/s/ Paul Hood

Paul Hood