

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

|                           |   |                             |
|---------------------------|---|-----------------------------|
| UNITED STATES OF AMERICA, | ) |                             |
|                           | ) |                             |
| Plaintiff,                | ) |                             |
|                           | ) |                             |
| vs.                       | ) | Case No. 4:24-cr-00029-BP-2 |
|                           | ) |                             |
| JOEL WRIGHT,              | ) |                             |
|                           | ) |                             |
| Defendant,                | ) |                             |

**DEFENDANT’S MOTION TO MODIFY CONDITIONS OF RELEASE**

COMES NOW the Defendant, Joel Wright, by and through his counsel, Jeffrey Gedbaw, and moves this 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 his Pretrial Services Officer. Mr. Wright resides in Texas and is supervised there. He is only currently permitted to travel to the Western District of Missouri for Court or attorney meetings. In support of this motion, Mr. Wright states the following:

1. The Defendant was arraigned on February 29, 2024 (Doc. 46). He has no prior criminal history, and the Government did not seek detention. Mr. Wright’s current conditions of release were previously ordered by the United States District Court for the Northern District of Texas. The current conditions limit Mr. Wright’s travel to the “Western and Northern District of Texas and directly to and from the Western District of Missouri for Court or consultation of counsel.”

2. Mr. Wright is asking this Court to modify that previously imposed condition so that he can attend the funeral of a family member that is scheduled for Friday, March 29, 2024. Specifically, the deceased individual is his stepfather, Earl Cornelius.

3. Mr. Wrioth respectfully moves this Court to modify the previously cited travel restrictions 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 of 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.**

4. Based on an email exchange with Mr. Wright’s Pretrial Services Officer in the Western District of Missouri, they do not have any objection to this modified language. Furthermore, it should be noted that Defendants Daisha Sanders has filed a virtually identical motion (Doc. 88), which was granted by the Court (Doc. 89). Additionally, Defendant Denise Sanders filed a virtually identical motion (Doc. 86), which was also granted by the Court (Doc. 87).

5. Counsel for Mr. Wright has consulted with Assistant United States Attorney Paul Becker regarding this matter, and Mr. Becker has informed counsel that he has no objection to this request.

6. Due to the fact that Mr. Wright is charged with a non-violent offense; has no criminal history; neither the Pretrial Services Office in Texas or the Pretrial Services Office in the Western District of Missouri objects to this request; and identical requests have already been granted for two of the other co-defendants in this case, counsel for Mr. Wright requests that this Court enter an Order modifying the conditions of release as set forth in paragraph 3, above.

WHEREFORE, for the reasons set forth above, it is requested that this Court modify the conditions of the defendant’s bond and grant him authorization to travel to the Kansas City, Missouri area, subject to pre-approval of his Pretrial Services Officer.

Respectfully submitted,

*/s/ Jeffrey Gedbaw*

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on March 28, 2024, a true copy of the foregoing was served on all parties by electronic filing through the ECF system.

*/s/ Jeffrey Gedbaw*

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Jeffrey Gedbaw