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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

United States of America, Plaintiff, v. James Sean Freeman, Defendant.	Case No. 2:26-cr-00107-JAD-NJK **Unopposed Motion for Single-Day Travel to Tijuana for Dental Care**

Motion

Mr. Freeman respectfully requests permission for single-day travel to Tijuana, Mexico for dental care on August 14, 2026. He further requests that the Court order the government to return his passport to him for a limited period of time to facilitate travel. This motion is unopposed.

Points & Authorities

The Court may modify conditions of pretrial release pursuant to 18 U.S.C. § 3142(c)(3). Specifically, "[t]he judicial officer may at any time amend the order to impose additional or different conditions of release." *Id.*

Mr. Freeman respectfully requests permission to travel to Tijuana, Mexico for a single day (August 14, 2026) for dental care. Mr. Freeman has received dental care from Amatista Estetica Dental on a prior occasion. (Ex. A (messages regarding Mr. Freeman's prior appointment in 2025).) Mr. Freeman now has scheduled an appointment for August 14, 2026. (Ex. B (messages confirming upcoming appointment).) He seeks dental care in Tijuana because it is more affordable than dental offices in the United States. If permitted to travel for the appointment, he would travel by car and he would be accompanied by his cousin (a woman approximately 35 years old). Mr. Freeman further requests that the Court order the government to provide him with his passport temporarily to facilitate travel. He would request that the Court order the passport to be made available to him no later than August 13, 2026, and he would return it to the government on August 15, 2026.

Defense counsel has conferred with pretrial services and the government. Neither entity has any objection and will defer to the Court.

Dated July 28, 2026.

Respectfully submitted,

Rene L. Valladares
Federal Public Defender

/s/ Rick Mula
Rick Mula
Assistant Federal Public Defender

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

United States of America, Plaintiff, v. James Sean Freeman, Defendant.	Case No. 2:26-cr-00107-JAD-NJK **Order**

Good cause appearing, Mr. Freeman's unopposed motion is granted.

IT IS THEREFORE ORDERED that Mr. Freeman may travel to Tijuana, Mexico, on August 14, 2026, for the sole purpose of obtaining dental care from Amatista Estetica Dental.

IT IS FURTHER ORDERED that the government must make Mr. Freeman's passport available to him no later than August 13, 2026.

IT IS FURTHER ORDERED that Mr. Freeman must return his passport to the government no later than August 15, 2026.

IT IS SO ORDERED.

DATED this 29th day of July, 2026.

UNITED STATES MAGISTRATE JUDGE

EXHIBIT A

EXHIBIT A

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Amatista Estetica Dental



James freeman. 6:25 PM ✓✓

September 16, 2025

Good morning, james! Could you come on the 24th at 8 am? 8:18 AM

There is nothing sooner it's like a emergency 9:01 AM ✓✓

An apology at the moment we are fully booked all this week but let me check if some patients cancel their appointments and I'll let you kbkw 9:03 AM

Know*

Message

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What days donu habe available
10:10 AM

Next week we have availability on the 24th, 25th and 26th at 8 am :)
10:13 AM

24th 10:35 AM

How much for just a deep cleaning for someone the want to get there teeth cleaned as welll 10:36 AM

Hola buen día, confirmamos su cita en Amatista / Tijuana el 2025-09-24 a las 8:00:00 AM.

Hello! We confirm your appointment at Amatista / Tijuana on 2025-09-24 at 8:00:00 AM.

Para garantizar una atención oportuna y evitar retrasos en la agenda de los demás pacientes, le solicitamos atentamente llegar a tiempo.

To ensure timely service and avoid delays in the schedules of other patients. we kindly request

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Hola buen día, confirmamos su cita en Amatista / Tijuana el 2025-09-24 a las 8:00:00 AM.

Hello! We confirm your appointment at Amatista / Tijuana on 2025-09-24 at 8:00:00 AM.

Para garantizar una atención oportuna y evitar retrasos en la agenda de los demás pacientes, le solicitamos atentamente llegar a tiempo.

To ensure timely service and avoid delays in the schedules of other patients, we kindly request that you arrive on time.

11:04 AM

«How much for just a deep cleaning for someone the want to get there teeth cleaned as welll»
– the deep cleaning has a cost of 160 dollars :)

11:05 AM

Jana Gillis 12/18/1989
Ok and thus lerson is coming with me on the 24t can u put them down for a cleaning please and thank you

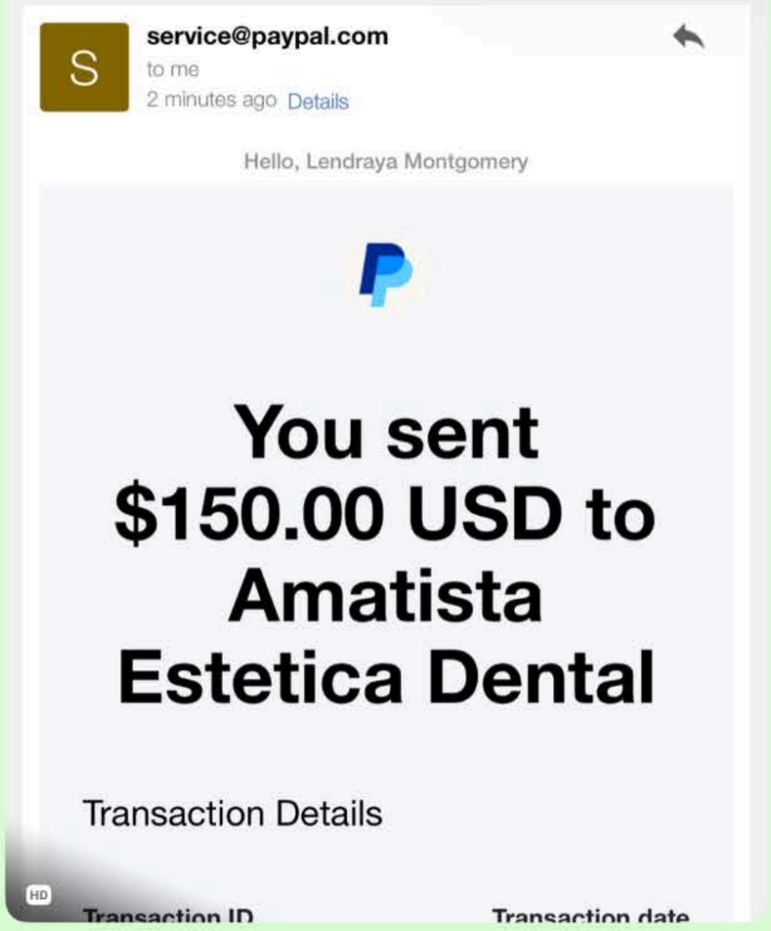
11:06 AM

EXHIBIT B

EXHIBIT B

3:56 9:18 51

+52 990 103 0538



Aug 14 2026
New appointment 10:25 AM

Thank you so much 10:25 AM

Hola buen día, confirmamos su cita en Amatista / Tijuana el 2026-08-14 a las 1:30:00 PM.

Hello! We confirm your appointment at Amatista / Tijuana on 2026-08-14 at 1:30:00 PM.

Lendraya Montgomery 10:36 AM

thank you 10:36 AM

Thank you 10:39 AM

thank you 10:40 AM