1 2 3 4 5 6 7	Nanci L. Clarence (SBN 122286) Josh A. Cohen (SBN 217853) CLARENCE DYER & COHEN LLP 899 Ellis Street San Francisco, CA 94109 Tel: (415) 749-1800 Fax: (415) 749-1694 nclarence@clarencedyer.com jcohen@clarencedyer.com Attorneys for Defendant ERIC OMURO	
8		
9	UNITED STATES DISTRICT COURT	
10	NORTHERN DISTRICT OF CALIFORNIA	
11	SAN FRANCISCO DIVISION	
12	UNITED STATES OF AMERICA,	CASE NO. CR-14-0336 WHO (NC)
13	Plaintiff,	STIPULATION AND [PROPOSED] ORDER MODIFYING CONDITIONS OF RELEASE
14	V.	
15	ERIC OMURO,	
16	Defendant.	
17		
18	<b>STIPULATION</b>	
19	Defendant Eric Omuro is presently free on bond under conditions of release imposed by	
20	the Court. One of those conditions is that Mr. Omuro not access the Internet, either directly or	
21	indirectly. Having met and conferred, the parties agree and stipulate this condition should be	
22	modified as follows:	
23	The defendant shall not access any of the websites listed in the supplement filed by the	
24	government on July 1, 2014 (Docket No. 10). The defendant shall not access, develop, or	
25 26	contribute to any other websites that purport to provide escort services, massage services, strip	
26	club reviews, or related services. The defendant may access the Internet for all other lawful	
28	purposes, including but not limited to funding co	unsel, assisting in his legal defense, managing
40		

Case No. CR-14-0336 WHO

STIPULATION MODIFYING CONDITIONS OF RELEASE

1 and paying bills, online shopping, emailing friends and family, accessing social networks, playing 2 games, and locating and facilitating verifiable employment. 3 IT IS SO STIPULATED. 4 DATED: July 2, 2014 /s/ Nanci Clarence 5 NANCI CLARENCE JOSH COHEN 6 Attorneys for ERIC OMURO 7 8 **DATED:** July 2, 2014 9 /s/ Elise Becker 10 ELISE BECKER Assistant United States Attorney 11 12 **ORDER** 13 By stipulation of the parties, and for good cause shown, defendant Eric Omuro's 14 conditions of release are modified as follows. In lieu of the current condition prohibiting Internet 15 access, defendant Omuro shall comply with the following condition: 16 The defendant shall not access any of the websites listed in the supplement filed by the 17 government on July 1, 2014 (Docket No. 10). The defendant shall not access, develop, or 18 contribute to any other websites that purport to provide escort services, massage services, strip 19 club reviews, or related services. The defendant may access the Internet for all other lawful 20 purposes, including but not limited to funding counsel, assisting in his legal defense, managing 21 and paying bills, online shopping, emailing friends and family, accessing social networks, playing 22 games, and locating and facilitating verifiable employment. 23 All other conditions of release shall remain in effect. 24 IT IS SO ORDERED. 25 DATED: \_\_\_\_\_\_, 2014 26 NATHANAEL COUSINS UNITED STATES MAGISTRATE JUDGE 27 28

Case No. CR-14-0336 WHO

STIPULATION MODIFYING CONDITIONS OF RELEASE