

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN (Green Bay)

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 19-CR-00151-WCG-NJ-11

STEPHANIE M. ORTIZ,

Defendant.

**DEFENDANT'S MOTION TO MODIFY CONDITIONS OF RELEASE
FOR TRAVEL OUT OF STATE
JANUARY 29, 2020 TO FEBRUARY 7, 2020**

Stephanie M. Ortiz, by attorney Thomas G. Wilmouth, moves the Court to modify conditions of her release to permit her to travel out of the State of Wisconsin from January 29, 2020 to February 7, 2020 for employment purposes.

As grounds therefore, she states the following:

I. Together with her brother Ruben Ortiz, Jr., Stephanie Ortiz (hereinafter S. Ortiz) is charged in Count Two of the superseding indictment with money laundering on January 14, 2019. [R. 13]. It is alleged that on that date a cashier's check in the amount of \$5,000 was used to purchase a 2015 Tesla automobile, the funds associated with that check represented proceeds of some form of unlawful activity, and S. Ortiz knew the transaction was signed to conceal same. *Id.* S. Ortiz is not otherwise referenced in the superseding indictment.

2. S. Ortiz appeared via summons for her initial appearance on September 26, 2019. [R. 65; 69]. An Order setting conditions of release was entered on that date, which required S. Ortiz to post \$4,000 cash bail and among other conditions, not travel outside the State of Wisconsin. [R. 72]. Ortiz has been compliant with all conditions of bond.

3. The case has been designated as complex, and the Court will determine a pretrial motion schedule on December 16, 2019. [R. 85; 93].

4. S. Ortiz is employed at “End Domestic Violence Wisconsin” as the “Director of Prevention and Outreach.” Based upon her “Technology of Participation” training, S. Ortiz also works as an independent contractor for strategic planning with various organizations, including “Wise Women Gathering Place” in Green Bay. [R. 68: 2-3]. “Wise Women Gathering Place” provides advocacy, healing and prevention in domestic violence, sexual assault, dating violence, stalking, sex trafficking, and victims of crimes. See <https://ecf.wied.uscourts.gov/doc1/20314122700> [last visited December 10, 2019].

5. “Wise Women Gathering Place” has contracted S. Ortiz to travel on January 29, 2020 from Milwaukee, Wisconsin to Las Vegas, Nevada to there co-facilitate a conference starting on January 30, 2020 and ending on February 2, 2020 for the creation of a strategic plan for organization development over a three (3)

to five (5) year period for “Nevada Coalition to End Domestic and Sexual Violence.”

6. “Wise Women Gathering Place” has contracted S. Ortiz to travel on February 3, 2020 from Las Vegas, Nevada to Espanola, New Mexico to there co-facilitate a conference starting on February 4, 2020 and ending on February 6, 2020 for the creation of a strategic plan for organization development over a three (3) to five (5) year period for “Tewa Women United.” That organization provides support for Indigenous women to end violence against women and girls. See <http://tewawomenunited.org/about/> [last visited December 10, 2019]. S. Ortiz will travel from New Mexico to Milwaukee, Wisconsin on February 7, 2020, completing her contract work for “Wise Women Gathering Place.”

7. S. Ortiz will provide United States Probation Officer Amy Kosmoski, who is supervising S. Ortiz pretrial, the itinerary for her travel.

8. Assistant United States Attorney William J. Roach has no objection to this motion.

Dated at Green Bay, Wisconsin on December 12, 2019.

Respectfully submitted,

/s/ Thomas G. Wilmouth
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