

1 STEVEN F. GRUEL (SBN 213148)
2 315 Montgomery Street, 10th Floor
3 San Francisco, California 94104
4 Ph:(415) 989-1253
5 Fax: (415) 449-3622
6 attystevengruel@sbcglobal.net
7 Attorney for Def. IGNJATOV

8 MARILYN E. BEDNARSKI (SBN 105322)
9 Kaye, Mclane, Bednarski & Litt, LLP
10 975 East Green Street
11 Pasadena, California 91106
12 Ph: (626) 844-7660
13 Fax: (626) 844-7670
14 mbednarski@kmbllaw.com
15 Attorney for Def. HRISTOVSKI

16 UNITED STATES DISTRICT COURT
17 CENTRAL DISTRICT OF CALIFORNIA
18 EASTERN DIVISION - RIVERSIDE

19 UNITED STATES OF AMERICA,) No. ED CR 17-222(A)-JGB
20 Plaintiff,)
21 v.) **STIPULATION AND [PROPOSED]**
22 SLAVCO IGNJATOV, et al.,) **ORDER FOR FORWITH RELEASE**
23 Defendants.) **OF DEFENDANTS SLAVCO IGNJATOV**
24) **AND VALENTINO HRISTOVSKI**

25 Defendants Slavco Ignjatov and Valentino Hristovski by and through their
26 counsel, Steven F. Gruel and Marilyn E. Bednarski, respectively and the United
27 States of America, by and through its counsel, Assistant United States Attorney
28 Victoria A. Degtyareva, hereby stipulate as follows:

1. Plaintiff United States of America “USA” advises that it does not intend to pursue an interlocutory appeal of the Court’s August 24, 2018 Decision and Order granting the defendants’ motion to suppress evidence Dkt. No. 121;

- 1 2. The trial of this matter is set to commence on November 27, 2018.
- 2 3. Plaintiff USA further advises that it will not pursue the prosecution of the
- 3 Defendants Ignjatov and Hristovski and will be moving to dismiss the
- 4 First Superseding Indictment and prior Indictment filed against these two
- 5 defendants. However, Plaintiff USA will not immediately do so in order
- 6 to maintain the jurisdiction of the Court so that Plaintiff may be heard on
- 7 a motion it intends to bring seeking an amendment to the Court's written
- 8 order granting suppression. Plaintiff USA maintains that this amendment
- 9 will not affect the Court's decision to grant the defendants' motion to
- 10 suppress evidence.
- 11 4. The parties agree that fairness requires that the government's intention to
- 12 seek that amendment should not delay the defendants' forthwith release
- 13 from custody.
- 14 5. The Plaintiff USA shall return defendants' Ignjatov's and Hristovski's
- 15 passports, wallets and their contents seized at the time of their arrest to
- 16 them so that they may voluntarily leave the United States to return to
- 17 their homes in Canada.
- 18 6. The parties agree that there is no need for any bond or pretrial release
- 19 conditions.
- 20 7. The parties agree that any prior orders of detention as to Defendants'

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1 Ignjatov and Hristovski are vacated and release orders for each of them
2 may issue to the United States Marshal.

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4 SO STIPULATED.

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6 Dated: September 25, 2018

7 Respectfully Submitted,
8 /s/ Steven F. Gruel
9 STEVEN GRUEL
10 Attorney for Def. IGNJATOV

11 Dated: September 25, 2018

12 /s/ Marilyn E. Bednarski
13 MARILYN E. BEDNARSKI
14 Attorney for Def. HRISTOVSK

15 Dated: September 25, 2018

16 /s/ Victoria A. Degtyareva
17 VICTORIA A. DEGTYAREVA
18 Assistant United States Attorney
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