

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

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 02-1044M
	)	
PASTOR ROMERO,	)	
	)	
Defendant.	)	

**DEFENDANT'S OFFER OF PROOF REGARDING PRETRIAL RELEASE**

Comes now Defendant, by his attorney, John D. Stobbs II, and for his Offer of Proof Regarding Pretrial Release, states:

1. The undersigned has contacted Defendant's family members and has been advised that Defendant's grandparents, are willing to post property in order to secure bond for Defendant.
2. Attached hereto and marked as Exhibit A is a deed showing ownership of this piece of land as well as an appraisal indicating that the value of the property exceeds \$200,000.00.
3. Defendant lives at this address with his grandparents, wife and two children ages 3 and 1.
4. At the detention hearing, this Honorable Court voiced concern about Defendant being a flight risk if pretrial release was granted.
5. Defendant is an American citizen of Cuban descent meaning that a conviction would have *no impact* on him.
6. Fleeing on a bond would, because his grandparents would lose the property they are willing to post as bond which would leave his grandparents, wife and children without a place to live.
7. It cannot be stressed strenuously enough that the amount of time Defendant faces

is *not* so extraordinary that he would be willing to jeopardize his families' existence and well being.

8. Defendant has a solid work history, and was gainfully employed until February of 2002, and while the evidence is strong against Defendant, it is the undersigned's position that this Honorable Court can craft an Order which would ensure his appearance at any future court dates.

9. This Honorable Court could require that Defendant be placed on home confinement or that he be required to wear an ankle bracelet to ensure that he does not partake in further illegal activities.

WHEREFORE, Defendant requests that he be granted pretrial release and that his grandparents be allowed to post as bond the property mentioned in Exhibit A.

PASTOR ROMERO

STOBBS LAW OFFICES

BY:

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John D. Stobbs II, NO. 43052  
E.D.Mo. Number 40623  
Attorney for Defendant  
346 West St. Louis Avenue  
East Alton, Illinois 62024  
Telephone: (618)259-7789  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that on the 18<sup>th</sup> day of March, 2002, a copy of the attached **DEFENDANT'S OFFER OF PROOF REGARDING PRETRIAL RELEASE** was served on the following persons by depositing a copy of same in an envelope with postage prepaid in the United States Mails in the Post Office in East Alton, Illinois addressed as set out, namely:

Mr. Frederick Dana  
Assistant U.S. Attorney  
111 S. 10<sup>th</sup> Street  
St. Louis, Missouri 63102

STOBBS LAW OFFICES

\_\_\_\_\_  
346 W. St. Louis Ave.  
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