



fine of \$5,000 pursuant to 18 U.S.C. §3571(b). On September 14, 2022, Ms. Ferreira was sentenced to, among other things, 14 days of incarceration. On October 21, 2022, Ms. Ferreira received her Notice of Designation and Date to Report to FCI Aliceville, located in Aliceville, Alabama, on December 1, 2022.<sup>1</sup>

Ms. Ferreira is a Brazilian citizen who is in the United States on a temporary work Visa. Her primary form of identification is her passport. As stated above, she surrendered her passport to Pretrial Services as one of her conditions of pretrial release. Ms. Ferreira does have an Illinois driver's license with "Federal Limits" stamped on it. That license expired on July 10, 2022. Although TSA rules permit the use of expired drivers licenses, with certain restrictions, as a form of identification for travel, Ms. Ferreira is not a United States citizen, and has the "Federal Limits" stamped on her expired license. TSA Security Officers are too unpredictable at the airports. Out of an abundance of caution, and to ensure that she reports to the BOP facility on time, Ms. Ferreira needs her passport to travel.

## **II. RELEASE OF PASSPORT IS CRITICAL IN THIS CASE**

This Court has the authority to modify Ms. Ferreira's Judgement and Commitment order to require the custodian of Ms. Ferreira's passport to temporarily return it to her to enable her to serve her 14-day sentence. In the instant case, the temporary release of her passport to permit her to self-surrender is appropriate and necessary. Ms. Ferreira is not a flight risk. She has been and continues to be in full compliance with all conditions of her pretrial release. She has no prior contact with the criminal justice system. She has accepted her 14-days prison sentence. She has no

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<sup>1</sup> Ms. Ferreira has a pending unopposed motion before the Court requesting that the Court order BOP to place Ms. Ferreira in a facility closer to her home in Illinois. If the Court grants that motion and allow her to serve her 14-day sentence near her home in the Chicago, the instant motion may become moot.

desire or intent to flee. Both of her parents reside in the United States, she owns the condominium where she resides in Illinois, and has her dream job in Illinois as an environmental engineer. She needs to put this ordeal behind her.

### **III. CONCLUSION**

Ms. Ferreira has already taken responsibility for her actions and pled guilty to a misdemeanor offense. She has been sentenced to a 14-day term of imprisonment. She accepts her punishment and needs her passport to self-report to a BOP facility on or about December 1, 2022.

In short, there is minimal risk to granting the motion to order Pretrial Services to return Ms. Ferreira's passport to her. Ms. Ferreira is prepared to return the passport to the Clerk of the Court at the conclusion of serving her 14-day sentence.

Accordingly, Defense counsel respectfully request that the instant unopposed motion be granted.

Dated: November 18, 2022

Respectfully submitted,

*Lionel André*

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 18, 2022, I caused a true and correct copy of the foregoing motion to be served via the Court's ECF system to all counsel of record in this matter.

/s/ Lionel André