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6 Attorneys for Defendant
JASON EDWARD THOMAS CARDIFF

7
8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
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11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 JASON EDWARD THOMAS
15 CARDIFF,

16 Defendant.
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Case No. 5:23-cr-00021-JGB

**JASON CARDIFF'S *EX PARTE*
APPLICATION FOR PERMISSION
TO TRAVEL TO KANSAS CITY**

*[Filed concurrently with Declaration of
Stephen G. Larson and [Proposed]
Order]*

EX PARTE APPLICATION

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2 By and through counsel of record, Jason Cardiff hereby seeks permission to
3 travel to Kansas City from December 30, 2023 to January 1, 2024.

4 Mr. Cardiff has been released on a \$530,000 appearance bond, justified in the
5 amount of \$500,000 with full deeding of real property. His release conditions
6 include, among other conditions: a travel restriction to the Central District of
7 California and the Southern District of Texas; a curfew between the hours of 8:00
8 p.m. and 8:00 a.m.; and placement in the custody of third-party custodian, Attorney
9 Stephen Cochell. Lilia Murphy and Brian Kennedy executed affidavits of sureties
10 in support of the bond. Ms. Murphy also deeded her home as collateral.

11 Mr. Cardiff is currently living with Attorney Cochell in the Kingwood, Texas,
12 and he is being supervised by United States Probation Officer Jack Sherrod of the
13 Southern District of Texas.

14 Jason Cardiff serves as the CEO and President of Redwood Scientific
15 Technologies, Incorporated (“Redwood”). He is seeking permission to travel to
16 Kansas City without his third-party custodian, Attorney Cochell, on December 30,
17 2023 with a return to Texas on January 1, 2024. The purpose of this requested
18 travel is to engage in two days of meetings and engagements with Redwood
19 shareholders and directors. Surety Brian Kennedy will be in attendance at these
20 meetings and engagements as well.

21 With the understanding that Attorney Cochell would not be traveling with Mr.
22 Cardiff, Probation Officer Sherrod advised that United States Probation does not
23 oppose this request. Officer Sherrod does, however, request that the curfew be lifted
24 for the two nights that Mr. Cardiff would be at a hotel in Kansas City, explaining
25 that it is logistically difficult to enforce a curfew in a hotel.

26 Should Mr. Cardiff be permitted to travel to Kansas City, he will nonetheless
27 remain subject to the bond condition that he participate in the Location Monitoring
28 Program.

1 Sureties Lilia Murphy and Brian Kennedy do not oppose Mr. Cardiff's
2 request to travel to Kansas City.

3 AUSA Valerie Makarewicz advised that the government opposes Mr.
4 Cardiff's request to travel to Kansas City.

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6 Dated: December 20, 2023

LARSON LLP

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By: /s/ Stephen G. Larson

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Stephen G. Larson

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Jonathan Gershon

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Attorneys for Defendant

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JASON EDWARD THOMAS CARDIFF

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