

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Crim. No. 23-945-MLG

DANIEL BALIZAN,

Defendant.

JOINT MOTION FOR CHANGE OF PLEA SETTING

The United States of America and Defendant Daniel Balizan (through counsel) file this joint Motion requesting a change of plea setting take place before the Honorable Matthew Garcia.

As grounds for this Motion, the parties provide the following:

On June 27, 2023, a federal grand jury charged Defendant with coercion and enticement of a minor, in violation of 18 U.S.C. § 2422(b). Doc. 2. On July 3, 2023, after a contested detention hearing, the Honorable Laura Fashing released Defendant to his home pending trial. Doc. 14.

The parties have reached a plea agreement in this case. Once Defendant pleads guilty, the United States will move that he be detained pending sentencing. Defendant will request that he be permitted to remain out of custody pending the sentencing hearing. For this reason, the parties request that the change of plea hearing take place before the district court.

Respectfully submitted,

ALEXANDER M.M. UBALLEZ
United States Attorney

/s/
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I HEREBY CERTIFY that I filed the foregoing pleading electronically through the CM/ECF system which caused defense counsel, Dan Cron, to be served by electronic means, as reflected on the Notice of Electronic Filing as indicated therein on May 1, 2024.

/s/

Jaymie L. Roybal

Assistant United States Attorney