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U.S. COURT  
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Attorneys for Defendant

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF IDAHO

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	Case No. CR-03-217-E-BLW
vs.	)	
	)	<b>MOTION TO TRANSFER</b>
AMY RENEE FLUCKIGER,	)	<b>DEFENDANT'S CUSTODY TO THE</b>
aka AMY BROWN	)	<b>IDAHO DEPARTMENT OF</b>
	)	<b>CORRECTIONS</b>
Defendant.	)	

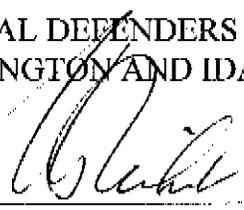
COMES NOW Defendant Amy Fluckiger, by and through counsel, and respectfully moves the Court for its Order returning Ms. Fluckiger to the custody of the State of Idaho Department of Corrections during the pendency of this prosecution. Ms. Fluckiger initially determined that she would remain in federal custody while addressing this matter. Ms. Fluckiger has a medical condition which was being adequately addressed while she was incarcerated at the Pocatello Women's Correctional Center (PWCC), which she believes not being adequately addressed while incarcerated at the Bannock County Jail in federal custody; and further, that she desires to continue programming at the PWCC, participation in which may assist her in an earlier state release date and in dealing with life challenges.

Ms. Fluckiger recognizes that her return to State of Idaho custody will not allow for credit for incarcerated time upon any potential federal sentence which may be imposed.

Defendant requests hearing upon this Motion as soon as possible or if no objection from the United States, that the Court enter an Order without hearing causing her custody to be delivered to the State of Idaho until further appearances before this Court.

DATED this 5 day of January, 2004.

FEDERAL DEFENDERS OF EASTERN  
WASHINGTON AND IDAHO

  
\_\_\_\_\_  
Steven Richert

### CERTIFICATE OF SERVICE

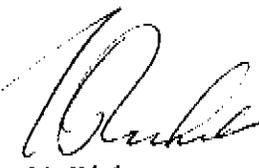
I HEREBY CERTIFY on the 5 day of January, 2004, I served a true and

correct copy of the foregoing document as follows:

Michael Fica, Esq.  
Assistant United States Attorney  
District of Idaho  
801 East Sherman, room 192  
Pocatello, ID 83201

U.S. Mail, postage prepaid  
 Hand Delivery  
 Overnight Mail  
 Facsimile

By:

  
Steven V. Richert