

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

GEORGE PIERRE TANIOS,

and

JULIAN ELIE KHATER,

Defendants.

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Case No. 1:21-cr-00222 (TFH)

PARTIES' JOINT NOTICE TO THE COURT
REGARDING DETENTION HEARING

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, Joseph Tacopina, Esquire, and Chad Seigel, Esquire, counsel for defendant Julian Khater, and Elizabeth Gross, Esquire, and Linn Richard Walker, Esquire, counsel for defendant George Tanios, hereby submit this joint notice to the Court in response to the Court's minute order dated April 21, 2021, which directed the parties to indicate the number and identities of any witnesses who will testify at the detention hearing scheduled for April 27, 2021, and the evidence that the parties will rely upon, including video footage.

The government intends to proceed by proffer and will not call witnesses during the hearing. The government has provided a series of video exhibits to the Court and the parties, and will refer to these exhibits in its written memorandum and during the hearing. To facilitate the presentation of this evidence, the government is requesting to appear in person for Tuesday's hearing. Counsel for the defendants do not object to the government appearing in person.

Defendant Khater is prepared to call up to 16 witnesses to testify virtually, if deemed necessary at the hearing. Their testimony would mirror the content of their letters to the Court, which were attached to Defendant Khater's submission. The list of witnesses includes:

1. Eleanor Fox (Mr. Khater's mother)
2. Elie Khater (Mr. Khater's father)
3. Michael Khater (Mr. Khater's brother)
4. Christopher Khater (Mr. Khater's brother)
5. John Khater (Mr. Khater's brother)
6. Alissa Latner (Mr. Khater's friend)
7. Jennifer Bozovic (Mr. Khater's cousin)
8. Josephine Khater (Mr. Khater's cousin)
9. Joanna Khater (Mr. Khater's cousin)
10. Amine Khater (Mr. Khater's cousin)
11. Geeta Khater (Mr. Khater's sister-in-law)
12. Pierre Khater (Mr. Khater's uncle)
13. Leila Farrelly (Mr. Khater's aunt)
14. Wadad Khater (Mr. Khater's aunt)
15. Irina Khater (Mr. Khater's aunt)
16. Anne Fox (Mr. Khater's aunt)

Defendant Tanios may call the following five additional witnesses to testify virtually:

1. Sean Ruth (friend)
2. Zyad Hage (cousin)
3. Joe Hage (cousin)
4. Tyler Lowers (friend)
5. Jamil Maroun (godfather to son)
6. Ramon Miguel (friend)

Respectfully submitted,

CHANNING D. PHILLIPS
ACTING UNITED STATES ATTORNEY
D.C. Bar No. 415793

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