

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

UNITED STATES OF AMERICA)
)
) Case No. 21-CR-036
)
)
)
GINA M. BISIGNANO)

**MOTION FOR MODIFICATION OF CONDITIONS OF RELEASE – TERMINATE
HOUSE ARREST RESTRICTIONS**

The Defendant, Gina M. Bisignano (“Bisignano” or “Defendant”), by and through her undersigned counsel, hereby moves this Honorable Court for modification of her conditions of release. Defendant is currently charged with felony and misdemeanor offenses and is on pretrial release with house arrest restrictions.

1. Defendant was arrested and ordered released by the Federal Magistrate in Los Angeles, California, after a full detention hearing.
2. Thereafter, Defendant was advised that the government appealed, and she turned herself in, before the appeal was heard.
3. Defendant spent 38 days in custody, after the start of her transport to Washington, D.C.
4. Defendant has been on house arrest since February 26, 2021.
5. Defendant is a United States citizen.
6. Ms. Bisignano is a small business owner in Beverly Hills, California, and an established member of her community.
7. Ms. Bisignano has appeared at all her scheduled court appearance(s), she remains in constant contact with her attorney, and she has remained in contact with Pretrial Services, as ordered.
8. Ms. Bisignano’s Pretrial Services Officer, Dashanta Valentine-Lewis, has been advised

of the Defendant's request to be terminated from house arrest, and defers to the court.

9. The Assistant U.S. Attorney assigned to this case, Kimberly L. Paschall, has been advised of the Defendant's request to be terminated from house arrest, and she also defers to the court.

10. Undersigned counsel has spoken to Ms. Bisignano's Pretrial Services Officer in Los Angeles, California, Gregory Kwon, and he is recommending that the Defendant be released from pretrial house arrest as she is in full compliance with all the requirements imposed upon her. Mr. Kwon has represented that the Defendant has given him no problems whatsoever, she has remained in constant contact with him, and she has made all her appointments with him in a timely fashion.

11. This Motion is supported and signed by Robert L. Jenkins, Jr., Esquire, an active and sponsoring member of the Bar of this Court, and A. Charles Peruto, Jr., Esquire, *Pro Hac Vice* counsel.

WHEREFORE, for these reasons, Defendant respectfully requests that this motion be granted, and that her conditions of release be modified to eliminate the conditions of house arrest.

MOTION TO TRAVEL

In the alternative, the Defendant, Gina M. Bisignano ("Bisignano" or "Defendant"), by and through her undersigned counsel, asks this court to approve the following request for travel to the State of Tennessee. In support thereof, she states as follows:

1. Defendant seeks to visit her sick mother at 216 Reece Avenue, Mountain City, Tennessee, from August 11, 2021, to August 16, 2021. Her entire extended family will be on this trip.
2. Defendant has appeared at all her scheduled court appearance(s), remains in constant

contact with her attorney, and has remained in contact with pretrial probation, as ordered.

3. Defendant's Pretrial Services Officer, Dashanta Valentine-Lewis, has been advised of the Defendant's travel request, and defers to the court.

4. The Assistant U.S. Attorney assigned to this case, namely, Kimberly L. Paschall, has no objection to this request, stating that she "defers to Pretrial Services."

5. This Motion is supported and signed by Robert L. Jenkins, Jr., Esquire, an active and sponsoring member of the Bar of this Court, and A. Charles Peruto, Jr., Esquire, *Pro Hac Vice* counsel.

WHEREFORE, the Defendant respectfully requests that her travel request be granted, and that she be permitted to travel to Tennessee on August 11, 2021, and to return to the State of California on August 16, 2021.

Respectfully submitted,

BYNUM & JENKINS

DATED: 07/26/2021

By: /s/Robert L. Jenkins, Jr.
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DATED: 07/26/2021

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CERTIFICATE OF SERVICE

I hereby certify on the 26th day of July 2021, a copy of same was electronically filed using the CM/ECF system, and thus delivered to the parties of record, and pursuant to the rules of the Clerk of Court:

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DATED: 07/26/2021

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ORDER

Upon consideration of Defendant’s Motion for Modification of Conditions of Release, and for for good cause shown, it is hereby ORDERED that Defendant’s Motion for Modification of Conditions of Release is GRANTED; and it is FURTHER ORDERED that Defendant’s pretrial house arrest restrictions be lifted.

It is FURTHER ORDERED that the Clerk forward a copy of this Order to all counsel of record. SO ORDERED this _____ day of _____, 2021.

Carl John Nichols
United States District Court Judge

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ALTERNATE ORDER

Upon consideration of Defendant’s Motion for Travel, and for good cause shown, it is hereby ORDERED that Defendant’s Motion for Travel is GRANTED; and it is FURTHER ORDERED that Defendant’s pretrial travel restrictions be amended to permit Defendant to travel to Tennessee on August 11, 2021, and to return to her home State of California on August 16, 2021.

It is FURTHER ORDERED that the Clerk forward a copy of this Order to all counsel of record. SO ORDERED this _____ day of _____, 2021.

Carl John Nichols
United States District Court Judge