

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

UNITED STATES OF AMERICA,

Plaintiff,

V.

CASE NO. 1:21-CR-222

GEORGE PIERRE TANIOS,

Defendant.

**DEFENDANT’S UNOPPOSED IN PART, MOTION TO
MODIFY BOND CONDITIONS**

Comes now, the Defendant, George Tanios, through counsel, Elizabeth B. Gross, Assistant Federal Public Defender, and respectfully moves this Honorable Court to modify the conditions of bond so that he is no longer subject to home detention, but instead subject to a curfew release.

This modification would allow for Mr. Tanios to come and go from his home during hours approved by this Court, while still keeping Mr. Tanios in the home at other specific times deemed appropriate. We submit this modification due to many issues arising out of Mr. Tanios’s home detention which have prohibited him from getting to multiple doctor’s appointments, attending meetings at undersigned counsel’s office, getting exercise, searching for employment, as well as wrapping up loose business issues at his former sandwich shop.

Specifically, Mr. Tanios has two medical appointments which will need rescheduled. The first, with [REDACTED], who provides [REDACTED] in Bridgeport, West Virginia. The second, with [REDACTED] in Morgantown, West Virginia. Further, after speaking with Mr. Tanios often, it is apparent that Mr. Tanios is facing some serious mental health and physical health

problems after his incarceration. Mr. Tanios would benefit from seeing a professional for these issues.

Mr. Tanios has a multitude of business and financial troubles since incarceration. Mr. Tanios has three small children and a wife to support at home. Mr. Tanios wants to financially support himself and his family. Mr. Tanios is financially not able to continue his sandwich business at this time. He is in the process of selling the business to another local business person. In order to sell the business and get out of his current business lease, he needs to clean out the shop and transfer property to the buyer. Mr. Tanios would like to be permitted to do that so he can avoid further financial despair.

Mr. Tanios recently acquired employment at a local pizza shop, [REDACTED], located at [REDACTED] in Morgantown, West Virginia, as a cook. The schedule for his first month would be from [REDACTED]. Once trained, he would be moved to cover the shop's night shift from [REDACTED]. He requests that the Court grant him the ability to accept this position and approving this employment opportunity.

As of the last status hearing, the pretrial services report noted that Mr. Tanios has no known violations to date and has not had any issues on home detention. Due to his compliance on home detention and his need to leave his home to tend to both medical and financial needs, Mr. Tanios through counsel, asks this Court to modify the conditions of his bond to give him the opportunity to tend to these important appointments and employment needs.

The government does not oppose two aspects of Mr. Tanios's modification. Undersigned counsel spoke with the United States Attorney's office through counsel, Mr. Scarpelli and Mr. Light

regarding this motion this morning. The government has no objection to Mr. Tanios working the above listed schedule, including a half hour commute to and from his new place of employment. Further, the government has no objection to Mr. Tanios seeking healthcare treatment at the above listed doctor as long as undersigned counsel sends scheduled appointment dates to the government, United States Probation, and the Court; in advance of such appointments if needed.

WHEREFORE, based on the foregoing, and the fact that the Defendant has been in compliance with the court order to date, there are good grounds to consider modifying the condition of home detention.

Respectfully submitted,

GEORGE PIERRE TANIOS

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CERTIFICATION OF SERVICE

I hereby certify that on October 25, 2021, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the District of Columbia under seal. A copy of which will be sent to the following via email.

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