

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

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

**SECOND 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. Defendant is a small business owner in Beverly Hills, California, and an established member of her community.
7. Defendant 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. On July 26, 2021, Defendant filed a Motion for Modification of Conditions of Release to Terminate House Arrest Restrictions before this Court.

9. At the time of the filing of Defendant's motion, Defendant represented that, (a) the Defendant's Pretrial Services Officer, Dashanta Valentine-Lewis, had been advised of the Defendant's request to be terminated from house arrest, and deferred to the court; (b) the Assistant U.S. Attorney assigned to this case, Kimberly L. Paschall, had been advised of the Defendant's request to be terminated from house arrest, and she also deferred to the court; and, (c) undersigned counsel had spoken to Defendant's Pretrial Services Officer in Los Angeles, California, Gregory Kwon, and he recommended that the Defendant be released from pretrial house arrest as she is in full compliance with all the requirements imposed upon her. Mr. Kwon represented that the Defendant had given him no problems whatsoever, she had remained in constant contact with him, and she had made all her appointments with him in a timely fashion.

10. On July 28, 2021, Defendant signed a plea agreement in the above captioned case

UNDER SEAL.

11. On August 4, 2021, Defendant appeared before this Court and entered a guilty plea in the above captioned case, UNDER SEAL, to multiple counts of the indictment.

12. On September 16, 2021, a Zoom hearing was held before this Court, and Your Honor advised that you would entertain the Defendant's motion in three (3) weeks to see whether the Defendant had any infractions during that time.

13. Defendant has not had any infractions, and files this Second Motion for Modification of Conditions of Release to Terminate House Arrest Restrictions before this Court.

14. 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.

Respectfully submitted,

BYNUM & JENKINS

DATED: 11/04/2021

By: /s/Robert L. Jenkins, Jr.
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DATED: 11/04/2021

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CERTIFICATE OF SERVICE

I hereby certify on the 4th day of November 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: 11/04/2021

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ORDER

Upon consideration of Defendant’s Second 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