

**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.**

**UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE**

Comes now, the Defendant, George Pierre Tanios, through his attorney, Elizabeth B. Gross, Assistant Federal Public Defender, and moves this Honorable Court to modify Mr. Tanios' conditions of release for a few days in order to visit his family in New Brunswick, New Jersey for Christmas. Mr. Tanios and his wife and three small children would depart Morgantown, West Virginia at 9:00 a.m. on December 23, 2021 and drive to his parents' home in New Brunswick, New Jersey to stay and visit with family and drive back home to Morgantown, West Virginia on December 27, 2021 with a planned arrival of 10:00 p.m.

Mr. Tanios has family in New Jersey that he has been unable to see and that cannot travel due to age and family circumstances. His sister is about to have a baby any day now, and he would like to be able to meet his new niece/nephew during the holiday get together for his family.

Mr. Tanios would check in with his pretrial services officer, upon his departures and arrivals to make the officer aware of his location. Mr. Tanios will keep his phone on and

available during this period of time and submit to any drug screens or check-in's this Court would request. It is undersigned counsel's understanding that Mr. Tanios remains on good behavior while on pretrial bond and has had no issues following the requirements made of him.

Undersigned Counsel has spoken with Mr. Scarpelli, Assistant United States Attorney, who confirmed they do not oppose these conditions of release at this time.

WHEREFORE, Mr. Tanios respectfully asks this court to modify his conditions of release in order for him to travel to New Jersey to spend the Christmas holiday with his family.

Respectfully submitted,

**GEORGE PIERRE TANIOS**

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**CERTIFICATION OF SERVICE**

I hereby certify that on December 10, 2021, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the District of Columbia, which will send notification of such filing to the following CM/ECF user:

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