

**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 MOTION TO MODIFY BOND
CONDITIONS SO THAT HE CAN TRAVEL**

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 may travel with his family for a family vacation. Mr. Tanios has been released to his home in Morgantown, West Virginia. Sentencing is scheduled for December 6, 2022. Mr. Tanios is not permitted to travel outside of the Northern District of West Virginia, and he is subject to electronic monitoring. He has a curfew. He has been compliant with these and all other conditions of release. Recently, his mother-in-law invited Mr. Tanios and his family (wife and 3 children) to stay with her at an apartment she rented at a resort at an address that will be provided to probation/pretrial services. Present will be his mother-in-law, Carla Plumley, her companion, the 3 Tanios children, and Mrs. Tanios. Mr. Tanios wishes to travel very early on Friday, August 12, 2022, and return to his home late at night on Tuesday, August 16, 2022. 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 this temporary modification during this trip.

WHEREFORE, based on the foregoing, and the fact that the Defendant has been in compliance with the court orders and conditions of release to date, we submit there are good grounds to consider modifying the condition of home detention and the travel restriction so Mr. Tanios can travel with his family on Friday, August 12, 2022, and return to his home late at night on Tuesday, August 16, 2022.

Respectfully submitted,

GEORGE PIERRE TANIOS

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CERTIFICATION OF SERVICE

I hereby certify that on August 5, 2022, 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 a copy to the following:

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