

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

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ANTHIME GIONET,

Defendant.

1:22-CR-00132 (TNM)

**DEFENDANT'S MOTION TO
ALLOW TRAVEL OUTSIDE U.S.**

INTRODUCTION

Defendant, Anthime Gionet, through counsel, hereby moves the Court to allow him to travel outside of the United States for a family vacation. Mr. Gionet is requesting to travel from the United States to Costa Rica with his parents. The trip dates would be from January 5, 2024, through January 12, 2024.

More specifics will be provided to the Court at the Courts request but not included here for purposes of privacy and safety.

Statement of Specific Points of Law and Authority in Support of Motion

1. On January 10, 2023, Mr. Gionet was sentenced to 60 days incarceration and 24 months of probation for a misdemeanor. To the best of counsel's knowledge, Mr. Gionet has complied with all aspects of this Court's Judgment from the same. Mr. Gionet has served all of the ordered time of incarceration and has not violated any aspect of his ordered

probation. Mr. Gionet is subject to Standard Condition 3 which provides, “You must not knowingly leave the federal district where you are authorized to reside without first getting permission from the court or probation officer.” Mr. Gionet has requested permission from his probation officer who in turn requested that he get permission from the Court.

Here, the Court has “broad latitude to prescribe reasonable conditions upon probation. United States v. McLeod, 608 F.2d 1076 (5th Cir. 1979). Additionally, according to the Overview of Probation and Supervised Release Conditions published on uscourts.gov and designated as, “*a resource for defendants and their families, judges, probation officers, prosecutors, defense attorneys, and other criminal justice practitioners,*” Chapter 2(c)(4)(c) states, “Research suggests that the probability of recidivism is reduced when defendants develop and maintain prosocial bonds to family, school, and work.” To be sure, Mr. Gionet will be with his parents who are supportive of his compliance on probation and with all other terms of his Judgment from sentencing.

CONCLUSION

Mr. Gionet is in full compliance with probation and his terms. He requests permission to leave the United States for a brief period to spend time with family. We respectfully request that he be allowed to travel and will provide the Court more detailed information on exactly where he will be upon the Court’s request.

Respectfully submitted this 27th day of November 2023.

THORNLEY LAW FIRM, P.C.

/s/Zachary Thornley

Pro Hac Vice Admission

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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on November 27, 2023, I caused a copy of the foregoing motion to be served on counsel of record via efiling.

/s/ Zachary J. Thornley
Zachary J. Thornley
Attorney for the Defendant