

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 1:22-cr-00132 (TNM)
	:	
ANTHIME GIONET,	:	
	:	
Defendant	:	

**GOVERNMENT’S RESPONSE TO DEFENDANT’S
MOTION TO ALLOW TRAVEL OUTSIDE U.S.**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully submits its Response to Defendant’s Motion to Allow Travel Outside U.S. and states as follows:

1. On July 22, 2022, Defendant Anthime Gionet pled guilty to Count 1 of an Information, which charged him with illegally parading, demonstrating, or picketing in a Capitol Building in violation of Title 40 U.S.C. § 5104(e)(2)(g) on January 6, 2021, the date that Congress was set to certify the vote count of the Electoral College of the 2020 Presidential Election.
2. On, January 11, 2023, this Court sentenced Gionet to 60 days’ incarceration followed by 24 months’ probation, a \$2,000 fine, \$500 in restitution, and a \$10 special assessment.
3. Gionet ended his term of imprisonment on March 31, 2023. Probation also has reported to the parties that he has paid fully the fine, restitution, and special assessment that the Court imposed.
4. Gionet now requests to travel from the United States to Costa Rica with his parents from January 5, 2024 through January 12, 2024.

5. Because Gionet is fully compliant with his terms of supervision, the Government defers the decision whether to allow him to travel in this instance to the opinion of Probation, which is now supervising him, and the Court, with the following recommended conditions if he is allowed to travel:
 - a. Defendant shall provide to the Court, Probation, and the Government Defendant's planned itinerary for each day of travel;
 - b. Defendant shall provide his telephone number to Probation, along with the telephone numbers of his parents, with whom Defendant is traveling, and Probation shall contact them promptly to confirm Defendant's travel plans;
 - c. Defendant must contact his Probation Officer daily by telephone at a reasonably convenient time for his Probation Officer to verify his location.
6. The Government believes that these are reasonable conditions to impose if the Court grants Gionet's Motion to Allow Travel Outside U.S.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on December 1, 2023, I caused a copy of the foregoing motion to be served on counsel of record via electronic filing.

/s/ Anthony L. Franks
Anthony L. Franks
Assistant United States Attorney