

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 1:21-cr-222 (TFH)
	:	
GEORGE PIERRE TANIOS,	:	
	:	
and	:	
	:	
JULIAN ELIE KHATER,	:	
	:	
Defendants.	:	

GOVERNMENT’S UNOPPOSED MOTION TO CONTINUE SENTENCING

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, hereby motions this court for a continuance of the sentencing dates set for both defendants in this case. The government has conferred with defense counsel for both defendants, who do not oppose this motion. In support of this motion, the government states as follows:

1. On July 27, 2022, defendant George Pierre Tanios entered a plea of guilty to one count of entering the restricted grounds of the U.S. Capitol, in violation of 18 U.S.C. 1752(a)(1) and (b)(2), and one count of disorderly conduct on restricted grounds in violation of 18 U.S.C. 1752(a)(2) and (b)(2). This Court scheduled defendant Tanios’ sentencing for December 6, 2022.

2. On September 1, 2022, defendant Julian Elie Khater entered a plea of guilty to two counts of assaulting a federal law enforcement officer in violation of 18 U.S.C. 111(a)(1) and (b). This Court scheduled defendant Khater’s sentencing for December 13, 2022.

3. On October 25, 2022, the government filed an unopposed motion to continue the sentencing date because government counsel had a trial in a separate matter involving a detained

defendant before the Honorable Judge Amy Berman-Jackson. The Court granted the government's unopposed request and rescheduled the sentencing dates to January 13, 2023.

4. Due to government counsels' schedule, the fact that the Pre-Sentence-Report became available on or about December 8, 2022, the Holidays, and the government's approval process for filing sentencing memoranda involving January 6 cases, the government needs additional time to file its sentencing memos.

4. The government has communicated with counsel for both defendants, who have no opposition to rescheduling both sentencings.

5. After conferring with the parties we respectfully request that the sentencing for the defendants be moved on February 17, 2023. The parties additionally request that the deadline for submitting sentencing memoranda be reset to February 10, 2023.

Respectfully submitted,

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