

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

<b>UNITED STATES OF AMERICA,</b>	:	
	:	
v.	:	<b>Case No. 22-cr-00149-JEB</b>
	:	
<b>ATHANASIOS ZOYGANELES,</b>	:	
<b>Defendant.</b>	:	

**MOTION FOR AUTHORIZATION  
OF INTERNATIONAL TRAVEL**

COMES NOW, Defendant, Athanasios Zoyganeles, by and through counsel and hereby respectfully requests the entry of an Order authorizing international travel to/from the country of Greece, beginning as soon as the Court grants this motion, returning on a date to be determined. As grounds, the following is stated:

1. The government takes no position on this motion, per Assistant U.S. Attorney Maria Y. Fedor.
2. Mr. Zoyganeles is charged with four misdemeanors: (Count 1) 18 U.S.C. § 1752(a)(1) (Entering or Remaining in a Restricted Building or Grounds), (Count 2) 18 U.S.C. § 1752(a)(2) (Disorderly and Disruptive Conduct in a Restricted Building or Grounds), (Count 3) 40 U.S.C. § 5401(e)(2)(D) (Disorderly Conduct in a Capitol Building), and (Count 4) 40 U.S.C. § 5401(e)(2)(G) (Parading, Demonstrating or Picketing in a Capitol Building).
3. A status hearing (VTC) is scheduled for July 1, 2022 at 10:00 a.m.

4. On March 3, 2022, Magistrate Judge Zia M. Faruqui conducted an initial appearance and he issued an Order Setting Conditions of Release. (Doc. 11) Section f. of the Release Order requires the “Defendant must receive Court approval before travel outside of the Continental United States.”

5. George Zoyganeles, the father of defendant Athanasios Zoyganeles, has recently suffered serious medical afflictions. Undersigned counsel has received an e-mail from the physician who is treating George Zoyganeles – which states that his prognosis is poor for recovery. (The referenced e-mail has been shared with AUSA Fedor.) Defendant Zoyganeles would like to travel to Greece (Evias Island) to be with his father and his family in this time of crisis.

6. While outside the United States, Defendant Zoyganeles is amenable to maintaining contact (by e-mail) twice weekly with the U.S. Pre-Trial Services Agency and with undersigned counsel.

7. Undersigned counsel recently spoke with U.S. Pre-Trial Services Officer Brandy Matheis who reports that defendant Zoyganeles is in compliance with all conditions of release.

8. Defendant Zoyganeles would like to commence travel to Greece as soon as the Court grants this motion.<sup>1</sup> At this time his return date is uncertain – and will

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<sup>1</sup> Defendant Zoyganeles has not yet purchased an airline ticket to /from Greece as he is waiting for the Court’s permission to travel abroad. If this motion is granted, counsel will provide to the U.S. Pre-Trial Services Agency and to AUSA Fedor the defendants specific (airline) itinerary.

be determined once he arrives in Greece and he consults with his immediate family members regarding his father's medical status.

9. At the present time defendant Zoyganeles does not have a U.S. passport. If the Court grants this motion, he intends to apply for an "emergency" U.S. passport. Upon his return to the United States, defendant Zoyganeles will, within 48 hours, surrender his U.S. Passport to the Clerk's Office at the United States District Court for the Northern District of Illinois/Chicago, or to any other person/entity whom the Court so directs.

WHEREFORE, for the foregoing reasons and such other reasons that may appear just and proper, defendant Athanasios Zoyganeles hereby respectfully requests the entry of an Order authorizing international travel to/from the country of Greece.

Respectfully Submitted,

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