

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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

**MOTION TO CONDUCT SENTENCING
HEARING BY VIDEO-CONFERENCING**

COMES NOW defendant, Anthanasiso Zoyganeles, by and through his attorney, Allen H. Orenberg, and hereby respectfully requests this Court to conduct the sentencing hearing by video-conferencing, instead of an “in-person proceeding.”

As grounds, the following is stated:

1. This motion is unopposed by AUSA Thomas D. Campbell.
2. On July 1, 2022, the Court accepted the defendant’s voluntary plea of guilty to Count 4 of the Information: 40 U.S. Code Sec. 5104(e)(2)(G – Parading, Demonstrating or Picketing in a Capital Building
3. A sentencing hearing is scheduled for January 26, 2023, at 11:00 a.m. Furthermore, the Court instructed the parties to personally appear in the United States Courthouse in Washington. D.C., on said date and time.
4. Mr. Zoganeles lives in Chicago, Illinois. The defendant’s income and other assets are such as he qualified for court-appointed counsel in this case. He will incur significant expenses if required to personally appear in Washington,, D.C.

on January 26, 2023. In addition to traveling by airplane, he will be required to reserve (and pay) for at least one night in an (expensive) Washington, D.C. hotel. His available limited funds, which may have to be used for travel and hotel, may otherwise be used to pay-off any fines, court-costs and the agreed upon restitution. (\$500.00)

Furthermore, Mr. Zoyganeles has plans to permanently move to the Country of Greece as soon as his obligations to this case are completed. Consequently, he is hoping to conserve his limited funds not only to pay-off the financial obligations to this case, but for anticipated expenses in connection with his re-locating to Greece.

5. Conducting a sentencing hearing by video-conferencing will further ensure the health and safety of the Court, court staff and the parties, in light of the ongoing COVID-19 concerns.

6. Mr. Zoyganeles will execute a waiver of personal appearance – which will be filed with the Court

Accordingly, for these reasons and such other reasons which may appear just and proper, defendant Anthanasiso Zoyganeles, hereby respectfully request that this Court to conduct the joint sentencing hearing by video-conferencing, instead of an “in-person proceeding.”

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of December 2022, a copy of the foregoing Motion to Conduct Sentencing Hearing by Video-Conferencing, and a proposed Order, was delivered to case registered parties by the CM/ECF court system.

Allen H. Orenberg