

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

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**V.**

**CASE NO. 1:21-CR-222**

**GEORGE PIERRE TANIOS,**

**Defendant.**

**UNOPPOSED MOTION TO IMPOSE CONDITIONS OF RELEASE**

Comes now, the Defendant, George Pierre Tanios, through his attorney, Elizabeth B. Gross, Assistant Federal Public Defender, and moves this Honorable Court to impose reasonable conditions of release at the hearing scheduled for August 20, 2021, at 11:30 am. It has been determined that Mr. Tanios is eligible for release from custody pending trial. Mr. Tanios submits that the standard conditions of supervision should apply. In addition, as a special condition, Mr. Tanios agrees to home incarceration with electronic monitoring as defined in AO 199 form, with GPS monitoring, at his home in [REDACTED], West Virginia, [REDACTED]. Additionally, Mr. Tanios will not possess weapons of any type, will not use illegal drugs, and will surrender his passport to the United States Probation Office. Undersigned Counsel has spoken with Mr. Scarpelli, Assistant United States Attorney, who confirmed they do not oppose these conditions of release at this time.

In addition, defense counsel requests that after 30 days defense counsel may petition the Court seeking to have the defendant's release conditions modified to include release from home confinement for work purposes (the name of the employer, location, type of work, hours worked, and work schedule will be supplied to the Court and government). The government will provide

the Court its position regarding modification of the defendant's release conditions at that time.

WHEREFORE, Mr. Tanios respectfully asks this court to impose these reasonable conditions of release pending trial.

Respectfully submitted,

**GEORGE PIERRE TANIOS**

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**CERTIFICATION OF SERVICE**

I hereby certify that on August 19, 2021, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the District of Columbia, which will send notification of such filing to the following CM/ECF user:

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