

1 Jeremy Warren
2 WARREN & BURSTEIN
3 State Bar No. 177900
4 501 West Broadway, Suite 240
5 (619) 234-4433
6 jw@wabulaw.com

7 Attorney for Defendant Tilotta

8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,) Case No.: 19cr4768-GPC-JLB
11)
12 Plaintiff,)
13 v.) Unopposed motion to modify conditions
14) of release to permit limited travel
15 GIOVANNI TILOTTA,)
16 Defendants.)
17)

18 At Mr. Tilotta's initial appearance on November 25, 2019, the Court set bond
19 (\$25,000 and one signature), which he posted that day. Travel was restricted to the
20 State of California, with permission to travel to Nevada for hockey events, and to
21 Arizona to transfer firearms.

22
23 Mr. Tilotta's hockey team was invited to a Memorial Day tournament in
24 Arizona, so he would like permission to travel there between May 21 and 26, 2020.
25 The government has no opposition to the request. The surety's acknowledgment is
26 attached.
27
28

1 Accordingly, Mr. Tilotta asks the Court to modify his conditions of release to
2 permit him to attend the tournament. A proposed order will be submitted to
3 chambers.
4

5 So moved.

6 Dated: February 26, 2020

s/ Jeremy Warren

Jeremy Warren

Attorney for Mr. Tilotta

8
9 The government has no objection.

10 Dated: February 26, 2020

s/ Nicholas Pilchak

s/ Andrew Haden

Nick Pilchak

Andrew Haden

Assistant United States Attorneys

14
15 Signature authorization

16
17 The government attorneys are aware of the content of the above motion and
18 have authorized me to sign on their behalf.

19 Dated: February 26, 2020

s/ Jeremy Warren

Jeremy Warren

Jeremy Warren
WARREN & BURSTEIN
State Bar No. 177900
501 West Broadway, Suite 240
(619) 234-4433
jw@wabulaw.com

Attorney for Defendant Tilotta

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

GIOVANNI TILOTTA,

Defendants.

) Case No.: 19cr4768-GPC-JLB

)

)

) Surety's acknowledgment and non-

) opposition to motion modify conditions of

) release to permit limited travel

)

)


)

)

)

I am the sole surety for Mr. Tilotta's bond. I am aware of his request to travel to Arizona in May 21-26, 2020, to attend a hockey tournament. I have no objection to the request and am willing to remain on the bond with the expanded travel condition.

Dated: 2/26/2020


Aleksandr J. Yarmolinets