

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](mailto: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 GIOVANNI TILOTTA, ) of release to permit limited travel  
15 Defendants. ) (corrected)  
16 )  
17 )  
18 )  
19 )  
20 )  
21 )  
22 )  
23 )  
24 )  
25 )  
26 )  
27 )  
28 )

At Mr. Tilotta's initial appearance on November 25, 2019, the Court set bond (\$25,000 and one signature), which he posted that day.

Mr. Tilotta has remained in compliance with his conditions over the last year. He and his family celebrate Thanksgiving on the East Coast each year. To that end, he requests permission to travel to Connecticut and New York between November 18 and 26, 2020. The government has no opposition to this request, and the surety's acknowledgment is attached.

Accordingly, Mr. Tilotta asks the Court to modify his conditions of release to permit him to see his family. A proposed order will be submitted to chambers.

1  
2 So moved.

3 Dated: November 3, 2020

s/ Jeremy Warren

4 Jeremy Warren  
5 Attorney for Mr. Tilotta

6 The government has no objection.

7 Dated: November 3, 2020

s/ Nicholas Pilchak

8 s/ Andrew Haden

9 Nicholas Pilchak  
10 Andrew Haden  
11 Assistant United States Attorneys

12  
13 Signature authorization

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

16  
17 Dated: November 3, 2020

s/ Jeremy Warren

18 Jeremy Warren  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

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](mailto: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 ) Surety's acknowledgment  
14 v. )  
15 GIOVANNI TILOTTA, )  
16 Defendants. )  
17 )

18 I am the surety for Mr. Tilotta. I am aware of, and consent to, his request to  
19 travel to Connecticut and New York between November 18 and 26, 2020. I agree to  
20 remain as Mr. Tilotta's surety.

21  
22  
23 Dated: November 3, 2020

  
\_\_\_\_\_  
Aleksandr J. Yarmolinets