

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 UNITED STATES DISTRICT COURT
8 SOUTHERN DISTRICT OF CALIFORNIA

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

17 Mr. Tilotta has remained at liberty on a \$25,000 bond since his initial
18 appearance in November, 2019. Travel is restricted to the State of California, with
19 permission to travel to Nevada and Arizona for limited purposes. He has remained
20 in full compliance with his conditions of release, and the Court has previously
21 authorized additional travel for family visits. *See* ECF-80, ECF-119.
22

23
24 Mr. Tilotta would like permission to travel to Michigan to see his friend (and
25 surety) for the July 4th holiday. His pretrial officer, Jovanna Mederos, and the
26 government have no opposition to this request.
27

28 Accordingly, Mr. Tilotta asks the Court to modify his conditions of release to

1 permit him to see his family between July 2 and July 6, 2021. A proposed order
2 will be submitted to chambers.

3 So moved.

4
5 Dated: June 21, 2021

s/ Jeremy Warren

Jeremy Warren

6 Attorney for Mr. Tilotta

7
8 The government has no objection.

9 Dated: June 21, 2021

s/ Nicholas Pilchak

10 s/ Andrew Haden

11 Nicholas Pilchak

12 Andrew Haden

13 Assistant United States Attorneys

14
15 Signature authorization

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

18
19 Dated: June 21, 2021

s/ Jeremy Warren

20 Jeremy Warren