

1 Jeremy Warren
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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. He has remained in full compliance with his
19 conditions of release, and the Court has previously authorized travel on several
20 occasions.
21

22 In light of his compliance over the last thirty months without incident, both
23 the government and Pretrial Services have no objection to expand Mr. Tilotta's
24 travel restriction to the continental United States. Mr. Tilotta's surety agrees. *See*
25 attached.
26
27
28

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

2 A proposed order will be submitted to chambers.

3 So moved.

4
5 Dated: April 20, 2022

s/ Jeremy Warren

Jeremy Warren

6 Attorney for Mr. Tilotta

7 The government has no objection to the request.

8
9 Dated: April 20, 2022

s/ Nicholas Pilchak

s/ Andrew Haden

10 Nicholas Pilchak

11 Andrew Haden

12 Assistant United States Attorneys

(with signature authorization)

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No.: 19cr4768-GPC-JLB
)	
Plaintiff,)	
)	Surety's acknowledgment and non-
v.)	opposition to motion to modify
)	conditions of release
GIOVANNI TILOTTA,)	
)	
Defendants.)	
)	
)	

I am the sole surety for Mr. Tilotta's bond. I am aware of his request to modify his conditions of release to permit travel within the continental United States, with advance notice to his pretrial officer.

I have no objection to the request and am willing to remain on the bond with the expanded travel condition.

Dated: April 21, 2022



Aleksandr J. Yarmolinets