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10 Attorney for Defendant
11 JOHN IOANE TUPOU

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

10 UNITED STATES OF AMERICA,) Case No. 4:23-cr-00248-AMO
11 Plaintiff,)
12 vs.) JOHN TUPOU'S UNOPPOSED MOTION
13 JOHN IOANE TUPOU, et al.) AND ORDER REGARDING
14 Defendants.) MODIFICATION OF RELEASE
15) CONDITIONS
District Judge: Hon. Araceli Martinez-Olguin
Magistrate Judge: Donna M. Ryu

16 John Tupou hereby move the Court to modify his release conditions.

17 1. Defendant John Tupou's conditions of release provide that he must reside at
18 a halfway house in San Francisco, California, allowing him to leave for attorney visits,
19 court appearances, court-approved obligations, or other activities pre-approved by his
20 pretrial services officer.

21 2. Mr. Tupou wishes to leave the halfway house on December 25, 2024 at
22 8:00 a.m. to travel to Oakland and Vallejo, California. He will return to the halfway
23 house no later than 9:30 p.m. on December 25, 2024. Mr. Tupou will spend time with his
24 family, including celebrating the Christmas holiday.

25 3. Mr. Tupou wishes to leave the halfway house on December 28, 2024 at
26 8:00 a.m. to travel to Hayward and Milpitas, California. He will return to the halfway
27 house no later than 7:00 p.m. on December 28, 2024. Mr. Tupou will spend time with his
28 family during this time.

1 4. Mr. Tupou wishes to leave the halfway house on December 29, 2024 at
2 9:00 a.m. to travel to San Leandro and Vallejo, California. He will return to the halfway
3 house no later than 7:00 p.m. on December 29, 2024. Mr. Tupou will spend time with his
4 family, including attending church.

5 5. Mr. Tupou wishes to leave the halfway house on January 1, 2025 at 7:00
6 a.m. to travel to Vallejo, Oakland, and San Francisco, California. He will return to the
7 halfway house no later than 7:00 p.m. on January 1, 2025. Mr. Tupou will spend time
8 with his family, including celebrating the Thanksgiving Day holiday.

9 6. Mr. Tupou wishes to leave the halfway house on January 4, 2025 at 8:00
10 a.m. to travel to Berkeley, San Francisco, and Burlingame, California. He will return to
11 the halfway house no later than 7:00 p.m. on January 4, 2025. Mr. Tupou will spend time
12 with his family during this time.

13 7. Mr. Tupou wishes to leave the halfway house on January 5, 2025 at 8:00
14 a.m. to travel to San Leandro, Oakland and Vallejo, California. He will return to the
15 halfway house no later than 7:00 p.m. on January 5, 2025. Mr. Tupou will spend time
16 with his family, including attending church.

17 8. No co-defendants or family related to this case will be present at these two
18 events.

19 9. No felons will be present. No guns or drugs will be on the premises. No
20 illegal activity will occur.

21 10. United States Pretrial Services Officer Sarai Canales has no objection to
22 this request. Mr. Tupou has provided the details of each request to Ms. Canales.

23 11. Assistant United States Attorney Alethea M. Sargent does not oppose the
24 motion.

25 12. All other conditions of his release shall remain in effect.

26 || DATED: December 12, 2024

Respectfully submitted,

/s/ James Thomson

JAMES THOMSON
Attorney for John Ioane Tupou

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

6 UNITED STATES OF AMERICA,) Case No. 4:23-cr-00248-AMO
7 Plaintiff,)
8 vs.)
9)
10 JOHN IOANE TUPOU, et al.)
11 Defendants.)
12)
13 _____)

**ORDER RE MODIFICATION OF
RELEASE CONDITIONS**

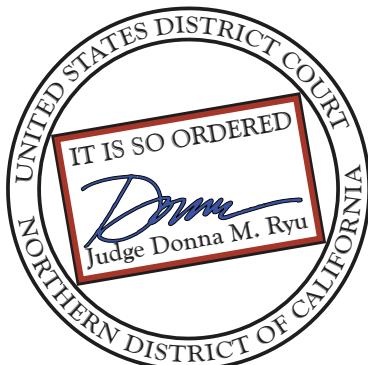
District Judge: Hon. Araceli Martinez-Olguin

14 Good cause having been shown, John Tupou's request to modify release
15 conditions to leave the halfway house on December 25, 2024 at 8:00 a.m., on December
16 28, 2024 at 8:00 a.m., on December 29, 2024 at 9:00 a.m., on January 1, 2025 at 7:00
17 a.m., on January 4, 2025 at 8:00 a.m., and on January 5, 2025 at 8:00 a.m. to travel and
18 spend time with his family is hereby GRANTED.

19 Mr. Tupou must return to the halfway house no later than 7:00 p.m. on December
20 28 and 29, 2024, January 1, 4 and 5, 2025, and no later than 9:30 p.m. on December 25,
21 2024.

22 IT IS SO ORDERED.

24 | Dated: December 13, 2024



DONNA M. RYU
Chief Magistrate Judge