

JAMES S. THOMSON
California SBN 79658
Attorney and Counselor at Law
732 Addison Street, Suite A
Berkeley, California 94710
Telephone: (510) 525-9123
Facsimile: (510) 525-9124
Email: james@ycbtal.net

Attorney for Defendant
JOHN IOANE TUPOU

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

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOHN IOANE TUPOU, et al.

Defendants.

Case No. 4:23-cr-00248-AMO

**JOHN TUPOU'S UNOPPOSED MOTION
AND ORDER REGARDING
MODIFICATION OF RELEASE
CONDITIONS**

District Judge: Hon. Araceli Martinez-Olguin
Magistrate Judge: Donna M. Ryu

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

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

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

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

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOHN IOANE TUPOU, et al.

Defendants.

Case No. 4:23-cr-00248-AMO

**ORDER RE MODIFICATION OF
RELEASE CONDITIONS**

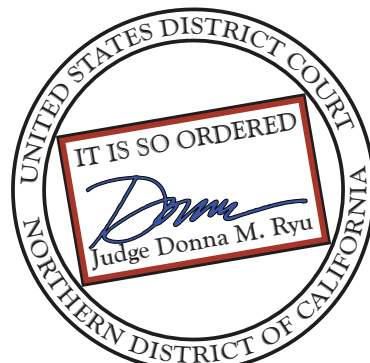
District Judge: Hon. Araceli Martinez-Olguin

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

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

IT IS SO ORDERED.

Dated: December 13, 2024



DONNA M. RYU
Chief Magistrate Judge