

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION

UNITED STATES OF AMERICA

CASE NO.: 2:22-CR-39-SPC-NPM

vs.

DANIEL JOSEPH TISONE
_____ /

UNOPPOSED MOTION FOR ADDITIONAL TIME BEFORE SENTENCING

COMES NOW the defendant, Daniel Joseph Tisone, by and through undersigned counsel, pursuant to the Federal Rules of Criminal Procedure, and files this, his Unopposed Motion for Additional Time before Sentencing. In support thereof, the defendant alleges the following:

1. On August 26, 2022, Mr. Tisone pled guilty to counts two, eight, fourteen, and eighteen of the indictment.
2. By pleading guilty, Mr. Tisone admitted, amongst other things, that he fraudulently obtained Government loan funds, in violation of 18 U.S.C, 1344.
3. As the Government is aware, Mr. Tisone utilized a significant portion of the fraudulently obtained funds to purchase two pieces of Naples real estate.
4. The two pieces of property are located at: 1) 550 Starboard Drive Naples, FL 34103 and 2) 1001 10th Avenue South #10 Naples, FL 34102.
5. With the approval and supervision of the Government, both properties were recently listed on the real estate market.
6. Mr. Tisone expects the properties to be sold soon with the proceeds going directly to the Government to cover the full amount of restitution owed.
7. Primarily due to summer travel, the properties have yet to be sold. The majority of potential purchasers have been away, yet are expected to return shortly.
8. Mr. Tisone is requesting that sentencing be set in 90-120 days, to afford him a few additional months to sell the properties and to be able to inform the Court at sentencing that restitution has been paid in full.
9. This motion is being filed in good faith without the intent to unnecessarily seek a delay in Mr. Tisone's sentencing date.
10. The Government does not oppose this motion.

WHEREFORE, based upon the above and foregoing, the Defendant respectfully requests this Court to grant the instant motion.

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically filed this 29th day of August, 2022.

Respectfully submitted,
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BY: /S/ **MARK EIGLARSH**

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