

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 1:21-cr-026 (CRC)

CHRISTOPHER MICHAEL ALBERTS

Defendant.

_____ /

DEFENDANT CHRISTOPHER MICHAEL ALBERTS'

**MOTION TO APPEAR AT SENTENCING MEMORANDUM
BY VIDEO CONFERENCE TECHNOLOGY**

Defendant CHRISTOPHER MICHAEL ALBERTS¹ (“Alberts”), by and through undersigned counsel, hereby respectfully moves the Court to allow him to participate in the scheduled sentencing memorandum by video conferencing systems, a common example of which at this time being Zoom. However, the request is not for any particular brand or software.

First, with the undersigned law firm’s intense trial schedule and so many things going on the undersigned counsel neglected to let Mr. Alberts know about the in-person pretrial until a few days ago. This makes travel to Washington, DC tough for him due to work obligations, with a need to change his requested schedule of time off from work from the time period of the hearing to an entire couple of days of travel. Counsel believe that there is really not much reason I have experienced for a defendant to need to be there in person.

¹ Note, with apologies, that due to a word processing mistake of staff, copying a previous motion, this was filed in the wrong case. Counsel apologizes to the Court for the inconvenience.

Second, the Probation Officer just filed a report that Defendant Alberts's compliance with pre-trial release from detention conditions – continued now after conviction at trial until sentencing – has been perfect. Alberts has faithfully and painstakingly complied with all conditions. Therefore, the Court should have no cause for concern now about his appearance at sentencing remotely. As a necessary component of his current release, Defendant Alberts is well-grounded in his community and extended family and has been deemed to be likely to a high confidence to appear for trial, which of course he actually did. (Again, the conditions of release were first put in place prior to trial and now continued through sentencing.)

July 19, 2023

RESPECTFULLY SUBMITTED,

John M. Pierce, Esq.
Counsel for Defendant

/s/ John Pierce

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CERTIFICATE OF SERVICE

I hereby certify that my law firm is filing the foregoing with the Court by its ECF record-keeping and filing system, which automatically provides a copy to:

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