

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

UNITED STATES OF AMERICA,

v.

JEROD HUGHES,

Defendant.

Hon. Timothy J. Kelly

Criminal No. 21-106 (TJK)

**DEFENDANT'S MOTION FOR  
PREPARATION OF CRIMINAL HISTORY CALCULATION**

Comes now Defendant, Jerod Hughes, by and through counsel, and respectfully requests this Honorable Court to order that the probation office prepare a criminal history calculation for Mr. Hughes.

In support of this motion, Defendant has a criminal history which could impact the sentencing consequences in this case. A criminal history calculation would help aid the parties in determining what the effect of any conviction would be.

**WHEREFORE**, for the above-stated reasons, the Defendant respectfully moves this Honorable Court to refer this matter to the probation office for preparation of a criminal history calculation.

Respectfully submitted,

DATED: April 10, 2021

/s/

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CERTIFICATE OF SERVICE

I certify that on this 10th day of April, 2021 I caused the foregoing to be filed with the court using the CM/ECF system that will send notification of such filing to the following registered users:

James Nelson  
Assistant United States Attorney  
555 4<sup>th</sup> St., NW  
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James.nelson@usdoj.gov

\_\_\_\_\_/s/\_\_\_\_\_  
Jonathan Zucker

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**ORDER FOR PRE-PLEA CRIMINAL HISTORY AND  
GUIDELINES CALCULATION**

Upon consideration of Mr. Hughes' Motion for Criminal History Calculation, it is this \_\_\_ day of \_\_\_\_\_ 2021 hereby

**ORDERED** that Mr. Hughes' Motion is **GRANTED**; and it is further

**ORDERED** that the United States Probation Office for the District of Columbia shall prepare the Criminal History calculation within forty-five (45) days of the date of this order.

\_\_\_\_\_  
Judge Timothy J. Kelly

**Copies to:**

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*Counsel for Defendant*