

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

UNITED STATES OF AMERICA,

v.

TIMOTHY LOUIS HALE-CUSANELLI,

Defendant.

Hon. Trevor N. McFadden

Criminal No. 21-00037-TNM

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

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

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/

Jonathan Zucker, Esq.

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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 4th St., NW
Washington, DC 20001
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_____/s/_____
Jonathan Zucker

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

Upon consideration of Mr. Hale-Cusanelli's Motion for Criminal History Calculation, it is this ____ day of _____ 2021 hereby

ORDERED that Mr. Hale-Cusanelli's 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 Trevor N. McFadden

Copies to:

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Jonathan Zucker
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Counsel for Defendant