

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

<b>UNITED STATES OF AMERICA</b>	)	
	)	
<b>v.</b>	)	Case No. 21-cr-225 (DLF)
	)	
<b>TRENISS JEWELL EVANS III,</b>	)	
	)	
Defendant.	)	

**MOTION FOR EXTENSION OF TIME  
TO FILE SENTENCING RECOMMENDATION**

**TO THE HONORABLE DABNEY L. FRIEDRICH, UNITED STATES  
DISTRICT JUDGE FOR THE DISTRICT OF COLUMBIA:**

Now comes Defendant, TRENISS JEWELL EVANS III, by and through his undersigned counsel, and respectfully moves this Honorable Court for an order granting Defendant 30 days’ extension of time to file sentencing recommendation.

On May 2, the Government filed its Objections to Presentence Investigation Report, which made various accusations and suggestions regarding Defendant’s financial status and appears to argue Mr. Evans has been inconsistent in his income declarations. Mr. Evans works in the sales field and has both a base income and an indefinite bonus income which fluctuates significantly from year to year.

We are awaiting additional financial information regarding Mr. Evans’ financial state, and this information is necessary to respond to the Government.

Additionally, it appears the Government is seeking to have Mr. Evans sentenced for allegations which the Government has previously agreed to dismiss. Counsel seeks additional time to assess and brief the implications of the sentence.

I.

Defendant's Sentencing Hearing is scheduled for May 31, 2022, at 11:00 a.m.

II.

Undersigned Counsel respectfully requests continuance so that Counsel may properly investigate and prepare a response to the Government's allegations.

III.

Undersigned Counsel respectfully requests a 30-day extension of time.

IV.

Undersigned counsel has emailed Assistant U.S. Attorney Francesco Valentini. Mr. Valentini stated that the government takes no position with respect to Mr. Evans's request for a 30-day extension of time. The government respectfully requests that, if Mr. Evans's request for an extension is granted, an extension of the same length also be applied to the deadline for the government's sentencing memorandum.

This Motion is made not for the purposes of delay.

WHEREFORE, PREMISES CONSIDERED, Defendant, TRENISS JEWELL EVANS III respectfully requests this Honorable Court to grant this Motion for Continuance, and for such other and further relief as this Honorable Court deems just and proper.

Dated: May 16, 2022

/s/ John M. Pierce  
John M. Pierce  
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*Attorneys for Defendant Treniss Jewells  
Evans III*

**CERTIFICATE OF SERVICE**

I hereby certify that, on May 16, 2022, this motion was filed via the Court's electronic filing system, which constitutes service upon all counsel of record.

/s/ John M. Pierce  
John M. Pierce

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Defendant. )

**ORDER**

On this date came on to be considered Defendant TRENISS JEWELL  
EVANS' Unopposed Motion for Continuance, and said Motion is hereby

GRANTED DENIED.

SIGNED on this the \_\_\_ day of \_\_\_\_\_, 2021.

\_\_\_\_\_  
HONORABLE DABNEY L. FRIEDRICH  
UNITED STATES DISTRICT JUDGE