

2. It is believed the defendant may have some criminal history, which could affect a sentence imposed by this Court, whether following a voluntary guilty plea or as a result of a trial conviction(s).

3. Only the U.S. Probation Office can provide the necessary information to ascertain the defendant's criminal history.

4. Counsel for the defendant requires the information to effectively advise the defendant on the disposition of this matter, whether by a pre-trial plea agreement or following a trial conviction(s).

WHEREFORE, for the foregoing reasons and such other reasons that may appear just and proper, counsel respectfully requests that this motion be granted.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of November, 2021, a copy of the foregoing Motion for Preliminary Determination of Defendant's Criminal History by the U.S. Probation Office, was delivered to case registered parties by the CM/ECF court system.

-S-
Allen H. Orenberg