

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

UNITED STATES OF AMERICA,

v.

KLETE DERIK KELLER,  
*Defendant.*

Case No.: 1:21-cr-00104-RJL

Hon. Richard J. Leon

**JOINT NOTICE OF PROPOSED DATES FOR  
DEFENDANT'S SENTENCING**

Both parties, Klete Derik Keller through counsel and the United States of America through counsel, respectfully submit this Notice and accompanying Order asking the Court to set a briefing schedule and sentencing hearing in the above-captioned matter in accordance with the Proposed Order attached hereto. In support thereof, the parties state as follows:

**DISCUSSION**

Since undersigned counsel entered his appearance in the above-captioned matter on March 27, 2023, Mr. Klete Keller has been actively cooperating in ongoing law enforcement investigations. To-date, as recently as June 2023, Mr. Keller has met with government investigators and prosecutors' multiple times regarding criminal matters already indicted and pending for trial, along with other criminal investigations pending possible indictment.

Given the nature of Mr. Keller's ongoing cooperation, the fact that neither party would be prejudiced by continuing Mr. Keller's sentencing—as evidenced by this Joint Notice—and the potential effect that such cooperation may have on Mr. Keller's eventual sentence, the parties, without assuming the availability of the Court's docket, propose to set the above-captioned matter down for sentencing on Friday, December 1, 2023, with their respective Positions on

Sentencing due no later than November 17, 2023, and their respective Objections & Corrections to the Pre-Sentence Report due no later than November 1, 2023.

**CONCLUSION**

In light of the aforementioned reasons, the parties respectfully ask this Court to enter the attached Order setting Mr. Keller's Sentencing Hearing for Friday, December 1, 2023, and establishing a briefing schedule setting the due date for the parties' respective Positions on Sentencing for November 17, 2023, and November 1, 2023 as the date on which to file their respective Objections & Corrections to the Pre-Sentence Report.

Respectfully Submitted,

KLETE DERIK KELLER,  
By Counsel

\_\_\_\_\_/s/\_\_\_\_\_  
Zachary A. Deubler, D.C. Bar #1615063  
Carmichael Ellis & Brock, PLLC  
108 N. Alfred Street, 1st Floor  
Alexandria, VA 22314  
703.684.7908 (T)  
703.649.6360 (F)  
[zach@carmichaellegal.com](mailto:zach@carmichaellegal.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on this 15th day of July 2023, I filed the foregoing pleading through the ECF system, which shall then send an electronic copy of this pleading to all parties in this action.

\_\_\_\_\_/s/\_\_\_\_\_  
Zachary A. Deubler, D.C. Bar #1615063