

**UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,

v.

Case No. 1:21-CR-0247-002-TFH

JONATHAN DANIEL CARLTON,

Defendant.

DEFENDANT'S MOTION TO CONTINUE SENTENCING

The Defendant, Jonathan Carlton, through his undersigned attorney, Richard Landes, Esq., pursuant to 18 U.S.C. Sec. 3161 (7)(A), respectfully requests this Court to continue the sentencing of this matter, currently scheduled for June 29, 2022, for a period of two weeks. As grounds for this Motion, Defendant states as follows:

Defendant plead guilty to the misdemeanor charge of Parading, Demonstrating, or Picketing in a Capitol Building in violation of 40 U.S.C. 5104(e)(2)(G). The PSR has been completed, recommendations made, and sentencing memorandums submitted by both the Government and Defendant.

Defense counsel for Mr. Carlton has been on trial in *USA v. Perez et al.*, (case No. 3:20-cr-86), a health care fraud and money laundering case in the Middle District of Florida (Jacksonville Division) before Judge Timothy Corrigan since May 9, 2022. The trial is nearly completed and the jury will begin its fourth day of deliberations on Monday, June 27. If the jury

returns a guilty verdict, the next phase of the trial, the forfeiture of specific property, will commence. As such, the matter in which defense counsel is currently on trial with may well continue into Wednesday, June 29, when this matter (USA v. Carlton) is scheduled for sentencing. As such, defense counsel requests a short two week continuance to a date convenient to the Court and the Government. While defense counsel does not believe the Government will object to this brief continuance, defense counsel files this motion without consent from the Government as defense counsel will be out of the office and in a federal courthouse awaiting a verdict tomorrow on Monday, June 27 with no ability to file this motion.

As such, it is respectfully requested that the sentencing in this matter be continued from June 29 to July 13, 2022 or a date convenient to the Court and Government counsel.

WHEREFORE, the Defendant, Jonathan Daniel Carlton, for the above reasons, respectfully requests this Honorable Court grant this Motion for a Continuance.

Richard Landes, Esq.

s/Richard Landes

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I HEREBY CERTIFY that the foregoing motion was electronically filed with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to Assistant United States Attorney Anne Veldhuis.