

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	CRIMINAL NO. 1-21-cr-28-7 (APM)
	:	
LAURA STEELE	:	
	:	
_____	:	

**MOTION TO CONTINUE SENTENCING**

Laura Steele hereby moves this Court for a continuance of sentencing in the above-captioned proceeding. In support of this motion, Ms Steele states as follows:

1. Laura Steele is before the Court pending sentencing with having been found guilty of: (1) 18 U.S.C. 1512(k); Conspiracy to Obstruct an Official Proceeding, (2) 18 U.S.C. 1512(c)(2), 2, Obstruction of an Official Proceeding, Aiding and Abetting. (3) 18 U.S.C. 372, Conspiracy to Prevent Members of Congress from Discharging their Duties, (4) 18 U.S.C. 1362, 2; Destruction of Government Property, (5) 18 U.S.C. 1752 (a)(1); Entering or Remaining Restricted Building or Grounds, (7) 18 U.S.C. 231(a)(3), 2; Obstructing Officers During a Civil Disorder, and (8) 18 U.S.C. 1512(c)(1), 2; Tampering with Document or Proceedings. Sentencing is currently set for 31 August, 2023.
2. Given the nature of these charges and these cases, Ms Steele is very aware of the possibility of prison-time being imposed. With this in mind, Ms Steele and her family had planned a short family vacation prior to any incarceration commencing. This vacation had been planned into the first week of September. Ms Steele is requesting the Court push back her sentencing to allow this vacation to occur.

3. Counsel notes that nothing else is to change with respect to pre-sentence schedule. The pre-sentence interview has been completed. We anticipate no delay in the pre-sentence report or sentencing memoranda. We are merely asking that the Court adjust the sentencing hearing date itself to accommodate the above.

WHEREFORE, for the above reasons, Laura Steele respectfully request that this Court grant this Motion to continue the currently scheduled sentencing hearing in the above-captioned proceeding.

Respectfully Submitted,

*/s/ Peter A. Cooper*

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing Motion to Continue is being filed via the Electronic Court Filing System (ECF), causing a copy to be served upon government counsel of record, this 8<sup>th</sup> day of June, 2023.

*/s/ Peter A. Cooper*

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Peter A. Cooper