

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

UNITED STATES OF AMERICA,	:	
	:	
v.	:	Case No. 21-0139-02 (TNM)
	:	
DANA JOE WINN & RACHEL LYNN PERT,	:	
	:	
Defendants.	:	

**JOINT MOTION TO CONDUCT SENTENCING
HEARING BY VIDEO-CONFERENCING**

COMES NOW defendants, Dana Joe Winn and Rachel Lynn Pert, by and through their respective attorneys, Allen H. Orenberg and Waffa Hanania, and hereby respectfully requests this Court to conduct the joint sentencing hearing by video-conferencing, instead of an “in-person proceeding.” As grounds, the following is stated:

1. This motion is unopposed by AUSA Brandon K. Regan.
2. On October 4, 2021, the Court accepted from both defendants their voluntary plea(s) of guilty to Count Two of the Indictment – Entering and Remaining in a Restricted Building or Grounds, in violation of 18 U.S.C. § 1752(a)(1).
3. A sentencing hearing is scheduled for December 20, 2021 at 10:00 a.m. Furthermore, the Court instructed the parties to personally appear in the United States Courthouse in Washington. D.C., on said date and time.

4. Both defendants, Dana Joe Winn and Rachel Lynn Pert, live in Middleburg, Florida. (Which is approximately 60 miles north of Orlando, Florida). Both defendant's work full-time however their respective income(s) and other assets are such as they both qualified for court-appointed counsel in this case. Furthermore, Ms. Pert is a single parent to two minor children, aged 10 and 7, who live at home with her. Consequently, it will be a significant financial burden on both defendants if they are required to travel to/from Middleburg, Florida to Washington, D.C. ¹ In addition to traveling by automobile, they will be required to reserve (pay) for at least one night in a Washington, D.C. hotel. Furthermore, Ms. Pert will have to make suitable arrangements for the care of her minor children if she is required to personally appear in Court on December 20th. Such suitable child care arrangements may include additional costs for doing so. Their respective limited funds, which may have to be used for travel and for child care, may otherwise be used to pay-off any fines, court-costs and agreed upon restitution (\$500.00 each).

5. Conducting a sentencing hearing by video-conferencing will further ensure the health and safety of the Court, court staff and the parties in light of the ongoing COVID-19 pandemic.

¹ The distance between Middleburg, Florida, and Washington, D.C., is approximately 750 miles. It is estimated that traveling one-way by automobile will

Accordingly, for these reasons and such other reasons which may appear just and proper, defendants, Dana Joe Winn and Rachel Lynn Pert, hereby respectfully request that this Court to conduct the joint sentencing hearing by video-conferencing, instead of an “in-person proceeding.”

Respectfully Submitted,

_____-S-_____
Allen H. Orenberg, # 395519
The Orenberg Law Firm, P.C.
12505 Park Potomac Avenue, 6th Floor
Potomac, Maryland 20854
Tel. No. 301-984-8005
Cell Phone No. 301-807-3847
Fax No. 301-984-8008
aorenberg@orenberglaw.com

_____-S-_____
Waffa J. Hanania
Assistant Federal Defender
Florida Bar #0888631
200 West Forsyth Street, Suite 1240
Jacksonville, Florida 32202
(904) 232-3039
waffa_hanania@fd.org

take at least 12 hours.

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of October, 2021, a copy of the foregoing Joint Motion to Conduct Sentencing Hearing by Video-Conferencing , was delivered to case registered parties by the CM/ECF court system.

-S-
Allen H. Orenberg