

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

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO. 1:21-cr-00711-TJK</b>
	:	
<b>v.</b>	:	
	:	
<b>JIA LIU,</b>	:	
	:	
<b>Defendant.</b>	:	

**MOTION TO COMPEL THE UNITED STATES PROBATION OFFICE TO AMEND  
DEFENDANT’S SELF-SURRENDER DATE**

Defendant Jia Liu, by undersigned counsel, hereby respectfully moves the Court for an order compelling the United States Probation Office to extend Mr. Liu’s self-surrender date to a day after September 14, 2023, in accordance with Mr. Liu’s judgment of conviction.

By way of background, Mr. Liu appeared before this Court on June 15, 2023, for sentencing. The Court imposed a sentence of four months’ imprisonment. At defense counsel’s request, and without objection from the government, the Court ordered that Mr. Liu’s date to self-surrender to the Bureau of Prisons be scheduled for after September 14, 2023, when he is to appear for sentencing in the Eastern District of New York for his separate pending prosecution, *United States v. Rodriguez & Liu*, No. 22-cr-70 (DG) (E.D.N.Y.). *See* June 15, 2023 Dkt. Entry, *United States v. Liu*, No. 21-cr-711 (TJK) (“Oral motion by counsel for the Defendant for self-surrender after 9/14/2023, heard and granted. Defendant ordered to self-surrender not earlier than 9/14/2023.”). The Court’s judgment contained the same self-surrender instruction. *See* Judgment at 2, ECF No. 42 (June 21, 2023) (noting that defendant shall self-surrender “as notified by the Probation or Pretrial Services Office” but “[n]o earlier than September 14, 2023”).

On July 9, 2023, the United States Probation Office for the District of Columbia sent a letter to Mr. Liu informing him that he must self-surrender to Devens FMC-Low on or before July 26, 2023. The Probation Office's letter is attached to this motion.

The Probation Office's self-surrender instructions are contrary to the Court's order and judgment that Mr. Liu's self-surrender date shall be "no earlier than September 14, 2023." Further, the Probation Office has declined to modify the self-surrender date after Mr. Liu and the Eastern District of New York Pretrial Services Agency notified it of this Court's order and judgment regarding self-surrender scheduling.

Because the Probation Office's self-surrender date is inconsistent with this Court's order and judgment, I respectfully request that the Court compel the Probation Office to modify Mr. Liu's self-surrender date to a day after September 14, 2023. I have discussed this request with counsel for the government, who consents.

I thank the Court for its understanding and attention to this matter.

Respectfully submitted,

/s/

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**CERTIFICATE OF SERVICE**

On July 20, 2023, I served a copy of the foregoing on counsel of record for the government via the Court's electronic filing system (CM/ECF). I also served a copy of this on the United States Probation Office via email.

/s/ Benjamin Yaster

Benjamin Yaster

Federal Defenders of New York, Inc.

*Counsel for Jia Liu*