

**N THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF COLUMBIA
NORTHERN DIVISION**

UNITED STATES OF AMERICA)	
)	
V.)	CASE NO.: 1:22-cr-214-RCL
)	
ANTHONY MICHAEL MAZZIO)	

MOTION TO RESCHEDULE DATE OF SURRENDER TO SERVE SENTENCE

MR. ANTHONY MICHAEL MAZZIO, by undersigned counsel, moves the Court to set a date after January 1, 2023, on which Mr. Mazzio should report to serve the sentence imposed by this Court. This motion is supported by the following:

1. On October 5, 2022, this Court imposed a judgment sentencing Mr. Mazzio to serve a sentence of sixty days in the custody of the Bureau of Prisons, with the recommendation that the Bureau of Prisons designate placement at a facility **close** to Dothan, Alabama. (Doc. 41 at 2, emphasis added). The Court directed that Mr. Mazzio surrender for service of the sentence “as notified by the United States Marshal or as notified by the Probation or Pretrial Services.” (*Id.*)

2. On or about October 17, 2022, the U.S. Probation Office for the District of Columbia sent a letter to Mr. Mazzio, directing him to report to Forrest City FCI Low in Forrest City, Arkansas on Tuesday, 11/15/2022, no later than 2 p.m. (Exhibit 1, attached).

3. Requiring Mr. Mazzio to report in barely four weeks will deprive him of the time necessary to earn money to pay his family’s expenses while he is in custody. As the Court is aware, Mr. Mazzio is self-employed in installing flooring, and he is responsible for the care and

support of his partner, their two children, his stepdaughter, and his niece and nephew.

(Presentence Report at ¶¶ 39, 50).

4. Moreover, Forrest City, Arkansas is at least 478 miles from Dothan, Alabama, and requires a car ride of seven hours and twenty-five minutes,¹ or a bus ride of sixteen hours and fifteen minutes.²

5. In addition, while all incarceration requires separation from family and poses a hardship, such distant incarceration in such a time frame will require Mr. Mazzio to be separated from his family on both Thanksgiving and Christmas of this year.

6. Mr. Mazzio therefore requests the Court to delay his surrender date until after January 1, 2023 and to instruct the Bureau of Prisons to designate a facility close to Dothan, Alabama for his incarceration.

7. Undersigned counsel has contacted government counsel regarding this motion and has been informed that the government takes no position on it.

WHEREFORE, Mr. Mazzio asks that this motion be granted.

Respectfully submitted,

/s/Christine A. Freeman
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¹ <https://www.mapquest.com/directions/from/us/al/dothan/to/us/ar/forrest-city> (last visited 10/27/2022).

² <https://www.greyhound.com/en/ecommerce/schedule> (last visited 10/27/22).

CERTIFICATE OF SERVICE

I hereby certify that on October 28, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

Respectfully submitted,

/s/Christine A. Freeman
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