

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Case No. 3:18 CR 30172 NJR
vs.)	
)	
JACE A. FAUGNO,)	
)	
Defendant.)	

DEFENDANT’S MOTION TO CONTINUE SENTENCING

COMES NOW Defendant Jace Faugno, by and through his attorney, Mark A. Hammer (“counsel”), and respectfully requests a continuance of his sentencing currently scheduled for January 14, 2020 for approximately six weeks. This motion is made on the following grounds:

- 1) Defendant voluntarily attended counseling at Professional Psychotherapy Services in St. Louis for about a year. Counsel is trying to get a copy of PPS’s relevant records to the Government and Court in sufficient time for consideration at Defendant’s sentencing.
- 2) Once those records are received, Counsel requires additional time to submit Defendant’s sentencing memorandum to the Court addressing Defendant’s counseling efforts and other information relevant to the Court’s consideration under 18 USC §3553(a). Counsel is also still considering whether to file objections to the final Presentence Investigation Report and requires additional time for that purpose.

- 3) Counsel has spoken to AUSA Hoell who has *no objection* to the proposed continuance.

After comparing conflicts in their respective schedules, the parties are asking that – should the Court’s approve Defendant’s motion – the case be continued to the second or third week in February. Counsel already has another matter scheduled before this Court on

February 10, 2020 at 1:30 pm (*United States v. Melissa Scanlon*) and would be available to handle this matter before or after that hearing if that would work with the Court's schedule.

Respectfully submitted,

/s/ Mark A. Hammer

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CERTIFICATE OF SERVICE

I certify that, on January 1, 2020, a copy of this document was electronically filed with the Clerk of Court, and served on all counsel of record, by the CM-ECF system.

/s/ Mark A. Hammer
