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 September 24, 2020 for about six to eight weeks. This motion is made on the following grounds:

1) Counsel finally received a report from Professional Psychotherapy Services concerning their treatment of Defendant during eleven months of his pretrial release until the transfer of his supervision to Kentucky. Therapist Jenny Toon provides an analysis of Defendant's therapeutic efforts during more than 30 sessions and her opinion of Defendant's amenability to treatment. Counsel wants to give the Government sufficient opportunity to consider the report and believes that the information will ultimately be important to the Court's consideration of Defendant's sentence.

2) Should the Court agree to continue the matter, and the pandemic conditions remain substantially unchanged as we near the new sentencing date, Defendant would agree to sentencing by video teleconference appearance to avoid travel from Kentucky, unnecessarily exposing himself, his counsel or the Court and staff in the Southern District of Illinois.

3) Counsel has spoken to AUSA Christopher Hoell who has *no objection,* and consents to

the proposed continuance.

For these reasons, Defendant respectfully requests that his sentencing be continued for

about six to eight weeks.

Respectfully submitted,

/s/ Mark A. Hammer

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CERTIFICATE OF SERVICE

I certify that, on September 4, 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

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