

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	CRIMINAL NO. 1:08cr437
)	
v.)	Honorable James C. Cacheris
)	
PRESTON PINKETT)	
)	
Defendants.)	

**JOINT MOTION OF THE UNITED STATES AND DEFENDANT TO CONTINUE
SENTENCING DATE**

The United States of America, by and through its undersigned counsel, G. Derek Andreson, Assistant United States Attorney, and the defendant, Preston Pinkett, by and through his attorney, hereby move this Honorable Court to continue the sentencing date in this matter from March 6, 2009 until May 1, 2009, or as is otherwise convenient to the Court. A proposed Order is being filed with this motion. The basis for this motion is:

1. This matter involves a complex international fraud involving investigative agencies of the United States and Canada. The investigation remains ongoing and has recently resulted in the execution of a search warrant and the identification of additional targets. Given that, additional time is needed to conduct debriefings of Mr. Pinkett and, if appropriate, arrange for his testimony.
2. The overwhelming majority of victims reside outside the United States. Additional time is required to gather information related to those victims that may be relevant at sentencing.

3. This is the first motion to continue the sentencing date.
4. Granting this motion is in the interest of all parties and will serve the ends of justice.

WHEREFORE, the undersigned respectfully request that this Court move to continue the sentencing date in this matter from March 6, 2009 until May 1, 2009 or as is otherwise convenient to the Court.

Respectfully submitted,

DANA BOENTE
ACTING UNITED STATES ATTORNEY

_____/s/_____
G. Derek Andreson
Assistant United States Attorney
District of Columbia Bar No. 489994
United States Attorney's Office
Justin W. Williams U.S. Attorney's Building
2100 Jamieson Avenue
Alexandria, Virginia 22314
Tel: (703) 299-3700
Fax: (703) 299-3981
Email Address: cindy.jamison@usdoj.gov

_____/s/_____
Jeremy Kamens
Assistant Federal Public Defender
Virginia Bar No.
Federal Public Defender
1650 King Street, Suite 500
Alexandria, Virginia 22314
Tel: (703) 600-0800
Fax: (703) 600-0880
Jeremy_Kamens@fd.org