UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 21-6149-MJ-HUNT

UNITED STATES OF AMERICA,

Plaintiff,

v.

CINDI ELLIS DENTON,

Defendant.

_____/

SECOND UNOPPOSED MOTION FOR A ONE-WEEK EXTENSION OF ARRAIGNMENT

The United States of America, through the undersigned Assistant United States Attorney, respectfully moves the Court for entry of an order briefly extending the date of arraignment by one week, seven (7) days and in further support states:

1. The Defendant in this matter is charged in a complaint with wire fraud, bank fraud, and conspiracy to commit bank fraud and wire fraud (D.E. 1).

2. The matter is set for an arraignment on June 21, 2021. (D.E. 15). The Parties have agreed to a resolution of this case, but the undersigned Assistant United States Attorney is awaiting final approval on the resolution from the United States Attorney. As such, the undersigned Assistant United States Attorney respectfully requests an extension of the arraignment date by seven (7) days, until June 28, 2021, to permit time to receive approval and file the Information.

3. On April 6, 2021, Chief Judge K. Michael Moore issued an administrative order concerning the global COVID-19 pandemic. (*See* 9th Order Concerning Jury Trials available at: https://web.flsd.uscourts.gov/uploads/adminOrders/2021/2021-33.pdf). This Administrative Order continued all jury trials in the Southern District of Florida to July 6, 2021, and continued all trial related deadlines. (*Id.* at ¶¶ 6–7).

4. The Administrative Order continued these deadlines in accordance with the Speedy Trial Act (18 U.S.C. § 3161(h)(7)(A)) and excluded all time from March 30, 2020 until July 6, 2021, finding that the "ends of justice [are] served by taking that action outweigh the interests of the parties and the public in a speedy trial." (*Id.* at ¶ 10).

5. The Parties have diligently worked to resolve this matter and expect approval within a few days. This case stems from an investigation into a $35 million conspiracy involving more than 30 participants and is being investigated by both the United States Attorney's Office for the Southern District of Florida and the Department of Justice in Washington, D.C. Accordingly, a resolution has required input from multiple offices and attorneys, and a review of a significant amount of data and evidence.

6. The United States has conferred with counsel for the Defense. Counsel for the Defense does not oppose this request, and has filed a waiver of appearance and a plea of not guilty. (D.E. 17).

Dated: June 18, 2021

Respectfully Submitted,

JUAN ANTONIO GONZALEZ
ACTING UNITED STATES ATTORNEY

By:*/s/ Lindsey Lazopoulos Friedman*
Lindsey Lazopoulos Friedman
Florida Bar No. 091792
Assistant United States Attorney
99 Northeast 4th Street
Miami, Florida 33132-2111
Tel: (305) 961-9168
Lindsey.Friedman@usdoj.gov

CERTIFICATE OF SERVICE

I HEREBY certify that on June 18, 2021, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF.

By: s/*Lindsey Lazopoulos Friedman*
Lindsey Lazopoulos Friedman
Assistant United States Attorney