

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

**UNITED STATES,
Plaintiff,**

v.

Case No. 1:23-cr-20036-KMM

**DANIELA RENDON,
Defendant.**

AGREED MOTION FOR CONTINUE

COMES NOW the undersigned Attorney, with agreement of United States Attorney, Jonathan Bailyn, and respectfully submit their agreed motion for continuance in the above styled cause, and as grounds thereof states:

1. On January 26, 2023, the Defendant was indicted charging her with violations of :

Count: 1-7 Citation: 18:1343.F WIRE FRAUD/18:1343.F Count: 10 Citation: 18:1028A.F AGGRAVATED IDENTITY THEFT/18:1028A.F Count: 8-9 Citation: 18:1957-4700.F MONEY LAUNDERING/18:1957-4700.F.

2. When Indictment in this case was filed on January 27, 2023.

3. The Defendant's counsel was retained on February 9, 2023.

4. The fraud scheme in Counts 1-7 is alleged to have occurred over a two-year period, but at this time is unverified. As to the time frame for the other charges and counts, the time frame is yet to be determined.

5. This is a complex case with multiple counts that include not only wire fraud but aggravated identity theft and money laundering, with more than usual media attention and scrutiny, because of the Defendant's higher than average media profile as a social media influencer.

6. The parties herein agree that there remain voluminous amounts of discovery to be reviewed and examined and resolution to be evaluated. Both parties wish to give this case the time and attention required, in order to thoroughly and properly litigate it. The current schedule with Calendar Call set on March 23, 2023, and Trial term to begin on March 27, 2023, rushes litigation in this case hinders the investigation and discovery processes for the parties involved.

7. The Defendant is filing her waiver of speedy through the end of the year with this motion for continuance.

8. For the foregoing reasons, the Parties respectfully request the Court grant their Motion to continue, and to reschedule the currently scheduled Hearing toward the end of the 2023.

Date: March 3, 2023

Respectfully Submitted,

/s/ Robert Mandell

ROBERT I. MANDELL, ESQ.

FBN: 15484

/s/ Asad Ali

ASAD ALI, ESQ.

CO-COUNSEL

FBN: 111887

Mandell Law, P.A.

189 S. Orange Ave. Suite 810

Orlando, FL 32801

Tel: (407)-956-1180

Fax: (407)-386-9550

Email: rmandell@fightforyou.org

Email: aali@fighgtforyou.org

kim@fightforyou.org

erodriguez@fightforyou.org

CERTIFICATE OF SERVICE

On February 9, 2023 via Conventional Filing, I filed the foregoing with the clerk of the court which will send notice to: US Attorney's Office, Southern District of Florida, 99 NE 4th Street, Miami, FL 33132.

/s/ Robert Mandell

ROBERT I. MANDELL, ESQ.

FBN: 15484

/s/ Asad Ali

ASAD ALI, ESQ.

CO-COUNSEL

FBN: 111887

Mandell Law, P.A.

189 S. Orange Ave. Suite 810

Orlando, FL 32801

Tel: (407)-956-1180

Fax: (407)-386-9550

Email: rmandell@fightforyou.org

Email: aali@fighgtforyou.org

kim@fightforyou.org

erodriguez@fightforyou.org