

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

CASE NO. 22-CR-00211-PAB

UNITED STATES OF AMERICA,

Plaintiff,

V.

2. STACE YATER WALLACE,

Defendant.

SENTENCING STATEMENT

Comes now Stace Yater Wallace through counsel, Richard J. Banta, pursuant to D.C.Colo.L.Cr.32.1, and submits this Sentencing Statement. In support of such Statement, Ms. Yater-Wallace states the following:

1. Ms. Yater-Wallace believes that a probationary sentence as recommended by the probation officer in Exhibit A to the Presentence Report (ECF doc 104-1) will result in a sentence that is "sufficient but not greater than necessary" to achieve the sentencing goals set forth in 18 U.S.C. § 3553(a).
2. Ms. Yater-Wallace will at sentencing request permission from the Court to travel from Colorado to Banff, Canada from April 26, 2025 to May 17, 2025 for a planned reunion with classmates from the Banff School of Fine Arts, then from May 17 to May 24 to Santa Barbara, California to visit with her elderly father.
3. Ms. Yater Wallace will be prepared to discuss these and other issues at the sentencing hearing currently set on April 25, 2025.

Respectfully submitted,

s/Richard J. Banta

Richard J. Banta
501 S. Cherry Street
Suite 1100-mb11
Denver, CO 80209
303-860-8048
FAX: 303-333-1195
E-mail: rjbanta@comcast.net
Attorney for Defendant
Stace Yater Wallace

CERTIFICATE OF SERVICE

I certify that on April 11, 2025, I electronically filed the foregoing Sentencing Statement with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

s/Richard J. Banta

Richard J. Banta