

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 1:15CR268
)	
Plaintiff)	HON. SARA LIOI
)	
vs.)	
)	
AMIR SAID AL-GHAZI,)	<u>UNOPPOSED MOTION FOR</u>
)	<u>PREPARATION OF A PRE-PLEA</u>
Defendant)	<u>PRESENTENCE REPORT</u>
)	

Now comes Defendant, Amir Said Al-Ghazi, by and through counsel, and respectfully moves this Honorable Court for the preparation of a pre-plea presentence report prior to any plea or finding of guilt in this case for the purpose of calculating Mr. Al-Ghazi's criminal history only.

The reason for this motion is that Mr. Al-Ghazi has a criminal history which could severely affect the sentencing consequences in this case. Mr. Al-Ghazi has multiple convictions which could impact whether he is a career offender under U.S.S.G. § 4B1.1. A criminal history calculation would help the parties determine whether this matter can be resolved without a trial. Assistant United States Attorney Matthew Shepherd has been notified of this request and has no objection to said request being granted.

WHEREFORE, for the above-stated reasons the Defendant respectfully moves this Honorable Court for the preparation of a presentence report prior to any plea or finding of guilt in this case for the purpose of calculating Defendant's criminal history only.

Respectfully submitted,

s/Roger M. Synenberg

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CERTIFICATE OF SERVICE

I hereby certify that on December 16, 2015 a true and correct copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/Roger M. Synenberg
ROGER M. SYNENBERG

Al Ghazi,A.mot.prep.psi