

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x
:
UNITED STATES OF AMERICA :
:
- v. - :
:
CHARLIE SHREM, :
:
Defendant. :
:
- - - - - x

APPLICATION FOR
ORDER OF CONTINUANCE

14 Mag. 164



STATE OF NEW YORK)
COUNTY OF NEW YORK : ss.:
SOUTHERN DISTRICT OF NEW YORK)

Serrin Turner, pursuant to Title 28, United States Code,
Section 1746, hereby declares under penalty of perjury:

1. I am an Assistant United States Attorney in the Office of
Preet Bharara, United States Attorney for the Southern District of
New York. I submit this affirmation in support of an application
for an extension of the order of continuance of the time within which
an indictment or information would otherwise have to be filed,
pursuant to Title 18, United States Code, Section 3161(h)(7)(A).

2. The defendant was charged with violations of Title 18,
United States Code, Sections 1960 and 1956, and Title 31, United
States Code, Sections 5318(g) and 5322(a), in a complaint dated
January 24, 2014, and was arrested on January 26, 2014.

3. The defendant was presented on January 27, 2014, and was
ordered released on a \$1 million bond.

4. At the initial presentment on January 27, 2014, the defendant consented to a waiver of his right pursuant to Rule 5 of the Federal Rules of Criminal Procedure to a preliminary hearing within 21 days of the initial appearance. Accordingly, under the Speedy Trial Act the Government initially had until February 26, 2014 within which to file an indictment or information.

5. Defense counsel, Marc Agnifilo, Esq., and I have had discussions regarding a possible disposition of this case beginning in early February 2014 and continuing as recently as February 24, 2014. The negotiations have not been completed and we plan to continue our discussions, but do not anticipate a resolution before the deadline under the Speedy Trial Act expires on February 26, 2014.

6. Therefore, the Government is requesting a 30-day continuance until March 28, 2014, to continue the foregoing discussions and attempt to reach a disposition of this matter. I have personally spoken to defense counsel, who consents to this request.

7. For the reasons stated above, the ends of justice served by the granting of the requested continuance outweigh the best interests of the public and defendant in a speedy trial.

I declare under penalties of perjury that the foregoing
is true and correct, pursuant to 28 U.S.C. § 1746.

Dated: New York, New York
February 26, 2014

A handwritten signature in black ink, appearing to read "Serrin Turner", written over a horizontal line.

Serrin Turner
Assistant United States Attorney

