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 UNITED STATES OF AMERICA
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10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 PAUL GARY WALLACE,

16 Defendant.

No. CR 20-293-AB

GOVERNMENT'S SUPPLEMENT TO
SENTENCING POSITION

Sentencing Date: August 5, 2022

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 18 Plaintiff United States of America, by and through its counsel
 19 of record, the Acting United States Attorney for the Central District
 20 of California, hereby submits this supplement with respect to
 21 sentencing for defendant PAUL GARY WALLACE.

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1 The government's supplement is based on the attached memorandum
2 of points and authorities, the files and records in this case,
3 including the evidence from trial, and such additional evidence and
4 argument as may be presented at the hearing on this matter.

5 Dated: July 28, 2022

6 Respectfully submitted,

7 STEPHANIE S. CHRISTENSEN
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9 Chief, Criminal Division

10 /s/ Jeffrey M. Chemerinsky
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1 MEMORANDUM OF POINTS AND AUTHORITIES

2 The government files this supplement to its previously filed
3 sentencing memorandum in order to preemptively respond to any claim
4 defendant may make at sentencing that he is reformed or can be
5 otherwise trusted to comply with the law. Based on defendant's
6 sentencing memorandum and arguments advanced previously, it appears
7 defendant may attempt to argue that he has been a force for good in
8 the community. Defendant has a long history of deception and
9 manipulation, and these arguments should not be trusted.

10 As an initial matter, the government notes that at defendant's
11 prior sentencing hearing on April 27, 2018, before this Court on a
12 felon in possession charge, he claimed he "was preaching against the
13 gang . . . and I started trying to lead the youth down a right path
14 and teaching the youngsters to take care of their kids, mothers turn
15 from drugs, you know, just leave the gang life alone." (CR 16-83-AB,
16 Dkt. No. 160, p. 12, Exh. A.) In fact, defendant claimed that he
17 found a new path in 2011 and was "ready to respect the law." (Id.,
18 p. 13.) Defendant stated at that sentencing hearing: "And my mother
19 always told me that one day God has a purpose for you, Paul, because
20 I was good with kids. He's saving you for a purpose, and that
21 purpose came to life in 2011. I came home, and I just started - I
22 went against everything the gang stood for. And the gang is more
23 like - right now, they're mocking me: You went against everything.
24 You turned on us." (Id.) Again, defendant said "now I woke up in
25 2011. I said 'I got to turn from this lifestyle. This is not me.
26 This is not who my mother raise me to be.'" (Id., p. 14.)

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1 As the Court is now aware, defendant's claims were nothing more
2 than lip-service. As the trial evidence showed, defendant spent a
3 great deal of his time in custody before sentencing in 2018 managing
4 the affairs of the East Coast Crips, orchestrating extortion, and
5 facilitating witness intimidation against perceived cooperating
6 witnesses.

7 Defendant's attempts to manipulate the system are clear.
8 Defendant claimed, for example, that he turned away from gang life in
9 2011. The trial record, however, make clear that claim is provably
10 false as he has now been convicted of a murder of a gang rival in
11 2014.

12 During his prior sentencing hearing, defendant claimed "I'm
13 ready to not have weapons. I learned my lessons." (Id., p. 13.)
14 But in a December 2016 jail call, while held at MDC, defendant is
15 caught explaining that he's still the same person - the person who
16 put the Coast on the "map" - he won't let anyone disrespect him, and
17 that he would blow "anyone's sh*t off" whether on the street or in
18 the jail who did so. (Exh. B, Trial Exh. 137, lodged with the
19 Court.) It should also be noted that defendant has been claiming
20 since at least 2006 that he was some form of gang interventionist.
21 (Exh. C ("He visits local high schools and recreation centers to
22 speak to teenagers about not joining gangs," dated January 9, 2006.)¹
23 The trial was filled with references to defendant's gang activity,
24 including murder, extortion, and assaults, after 2006. Finally, the
25 best evidence of defendant's lack of any type of reform and the

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27 ¹ This exhibit is part of the medical records produced by
28 defense as part of the documentation relied upon by defendant's
expert witness.

1 manipulativeness of any such claim is his involvement in a stabbing
2 in May 2021, while awaiting charges in this case. As the Court is
3 familiar, this stabbing was a result of perceived disrespect to
4 defendant and the potential threat that such disrespect posed to his
5 control over gang-affiliated inmates at MDC. Such conduct is hardly
6 evidence of defendant's reform. Rather, defendant remains unchanged,
7 a constant threat to the community, and a long-last disdain for the
8 rule of law.

9 In sum, the Court should view any claims of defendant being law
10 abiding or reformed as just his latest attempt to work the system and
11 manipulate this Court.