

1 JEREMY D. WARREN
2 State Bar No. 177900
3 Warren & Burstein
4 501 West Broadway, Suite 240
5 San Diego, CA 92101
6 (619) 234-4433
7 jw@wabulaw.com

8 UNITED STATES DISTRICT COURT
9 FOR THE SOUTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 MATTHEW WOLFE,

14 Defendant.
15
16

Case No.: 19cr4488-JLS

Defendant's sentencing
memorandum

March 19, 2024

17
18 Introduction

19 Matthew Wolfe was raised in a working-class family in New Zealand. He had
20 a relatively uneventful childhood, and in early adulthood was a responsible hard
21 worker who spent time with his friends and family. When his hometown was
22 suffering the aftermath of two powerful earthquakes, he accepted an out-of-the-
23 blue request to work for a childhood classmate, Michael Pratt, and came to
24 California. He was supposed to do basic backend computer work for Pratt's
25 company, but ultimately established roots in San Diego, becoming a father of two
26
27
28

1 along the way.

2 Over time, his role with the company evolved from backend support, payroll
3 and running errands for Pratt, to filming some of the shoots. His pay changed from
4 \$500 per week to an hourly rate as an independent contractor. Pratt later gave him
5 a part-ownership interest in a spin-off business, but he never made any money from
6 it. Instead, he lived modestly with his girlfriend until he was arrested in 2019.
7

8
9 Given the stakes involved, it took some time, but he eventually pleaded
10 guilty, recognizing he faces a lengthy sentence before deportation to New Zealand.
11 He is ashamed of his involvement, and wishes to convey his sincere apology to
12 everyone involved. In this memo, he provides some personal background, addresses
13 the allegations in the Presentence Report, and discusses an appropriate sentence.
14

15 The individual before the Court

16
17 Mr. Wolfe begins with his personal history. While some might argue his
18 personal history is irrelevant compared to the harm connected to this case, the law
19 says otherwise. The Supreme Court has repeatedly emphasized a sentencing court
20 must “consider every convicted person as an individual and every case as a unique
21 study in the human failings that sometimes mitigate, sometimes magnify, the
22 crime and the punishment to ensue.” *Pepper v. United States*, 131 S.Ct. 1229, 1240
23 (2011).
24
25

26 Put another way, “the punishment should fit the offender and not merely the
27 crime.” *Id.* Federal statutes and the Guidelines are in accord. The Court may
28

1 consider, without limitation, any “information concerning the [defendant’s]
2 background, character, and conduct.” 18 U.S.C. §3661; U.S.S.G. §1B1.4.

3 With that backdrop, who is the Matthew Wolfe the Court will sentence? The
4 PSR provides some overview but there is more.
5 Mr. Wolfe was raised in Christchurch, New Zealand.
6 His father was a police officer, his mother worked as an
7 administrator in a sports medicine clinic.
8
9



Mr. Wolfe (left) and family

10 As the attached letters describe, he was a calm,
11 kind, and above all loyal child. He also was incredibly
12 close to his younger sister Ella, and has remained so throughout their lives. For
13 example, his mother’s letter describes the support he gave her after her best friend
14 died in a jet ski accident when they were 14.
15

16 Mr. Wolfe’s tight bond with Ella strengthened when their parents divorced
17 and they were raised in joint custody for the rest of their childhood. They provided
18 each other the stability and security that allowed them to weather the volatility of
19 bouncing back and forth between houses each week. Their parents were loving,
20 however, and their childhood was otherwise normal.
21

22 Mr. Wolfe was a good student and a decent athlete. He enjoyed working with
23 computers but felt that higher education was not for him. He was eager to start
24 working. So after high school, he took a computer training class at Adept
25 Secretarial and Training Services Ltd., and was so proficient that when he
26
27
28

1 completed the course, they immediately offered him a job as an instructor.
2 Although this was over twenty years ago, the owner of the company, Evelyn Barr,
3 still recalls that Mr. Wolfe “stood out throughout his training” for, among other
4



5
6
7
8
9
10
11
12 *Mr. Wolfe with his sister and mother*

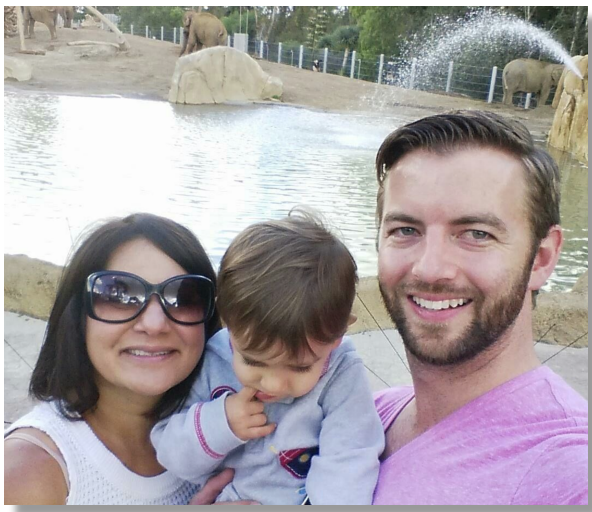
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
qualities, his “punctuality, reliability,
[being a] team player [and] quick learner.”
See support letters, attached. Ms. Barr
adds that “Matt always gave to me of his
best, loyal and hard working,” and adds he
was “well liked/respected by his students,
peers, senior staff and clients alike.”

14 Mr. Wolfe later sought to advance his career in the hospitality industry. He
15 was hired at The Rockpool, an Irish bar and restaurant in Christchurch. He quickly
16 rose to a manager’s position, and the owner, Peter Whitaker, writes they had
17 “complete confidence in his ability over a long period,” and “particularly to comply
18 with our strict sale of liquor act requirements.” Mr. Whitaker calls him “an honest
19 and diligent employee” who he “would have no hesitation in re-employing” upon his
20 return to New Zealand. Another of his supervisors, Kevin Earle, adds that
21 Mr. Wolfe was “honest and transparent in all of his dealings,” “well presented,
22 mature, and level-headed young man of calm demeanor, not given to foul language,
23 anger, or violence,” important qualities in a large bar environment where,
24 unfortunately, fights are common.
25
26
27
28

1 Mr. Wolfe was content in his life. And then in late 2010 and early 2011, New
2 Zealand was rocked by two massive earthquakes centered just outside
3 Christchurch, the largest city in the country at the time, and where Mr. Wolfe and
4 his family lived. Businesses and homes were damaged and destroyed, totaling an
5 estimated \$4 billion, a massive blow to a relatively small economy. Like many
6 others, the Wolfe family home suffered significant damage. More generally, the
7 economy ground to a halt, with a large proportion of businesses shuttered.
8
9

10 For young adults like Mr. Wolfe, it was an extremely rough time. There were
11 little job prospects and the national mood was dour. It was at this point that
12 Michael Pratt reached out to offer him a job in San Diego. (More on that below.)
13

14 Mr. Wolfe enjoyed living in Southern California. He had little spending
15 money but made friends and socialized in his spare time, going to the beach or to a
16 bar. One of his friends introduced him to a woman named Shannon Bass. She and
17 he became close friends, and she confided in him.
18



Eventually, Shannon told him she was pregnant and had broken up with her boyfriend. Their relationship continued to evolve and, undeterred by her pregnancy, they became a couple. As she writes the Court, “he promised to stand by

1 my side throughout the pregnancy. When our son was
2 born, Matt embraced him as his own.” Ever since, as the
3 letters attest, Mr. Wolfe has been a loving and devoted
4 father not only to their first child, Roman, but to their
5 second, Reign. As just one example, his friend Kelly
6 Johnson writes that when she visited from New Zealand,
7 a “memory that still warms my heart is Matt would take
8 Roman to a gelato place once a week in Little Italy for an
9 ice cream, and Roman would be ecstatic.”



10
11
12
13 To his credit, Mr. Wolfe has continued to be as fully involved in his children’s
14 lives as possible despite his incarceration. He writes and calls them, and they have
15 been able to visit him. He looks forward to being able to return to his role as a
16 father upon serving out his sentence.

17 18 Involvement in the offense

19 **A. Michael Pratt**

20
21 Mr. Wolfe knew Pratt from elementary school. Like most elementary school
22 children, they were friends with pretty much everyone in their class. But when
23 they went to different high schools, their friendship evaporated, and they lost touch
24 for the next six years.

25
26 Eventually, when Mr. Wolfe was working in computers, he received an
27 instant message from Pratt. Pratt told him he was working in adult pornography,
28

1 basically setting up websites to generate leads, and earning money as an affiliate.
2 And over the subsequent years, Pratt would reach out on occasion to say hi, and
3 would sometimes ask technical questions based on Mr. Wolfe's computer
4 knowledge. At some point, Pratt moved to Australia, and later to the United States
5 to pursue his business opportunities.
6

7 Shortly after the earthquakes, as mentioned, Pratt reached out again. He
8 said he needed some technical help in his business, and offered Mr. Wolfe a job in
9 San Diego. He said Mr. Wolfe would run the backend side of his business. In
10 exchange, Pratt would pay for his flight, provide him an apartment, and pay him
11 \$500 per week. With New Zealand's economy on the skids, Mr. Wolfe was intrigued.
12 Like most of the world, he had heard great things about California and, untethered
13 by a wife or children, it sounded like a great opportunity. He decided to make the
14 plunge.
15
16
17

18 Arriving in San Diego, Pratt provided him an apartment as promised, and
19 the pay was enough to get by. For the first year and a half or so, Mr. Wolfe worked
20 in the office, helping maintain the servers, handling payroll, running personal
21 errands for Pratt, and the like.
22

23 Over time, his work duties evolved, and in addition to the backend computer
24 work, he began filming shoots as well – ultimately becoming one of five different
25 videographers including Pratt, Gyi, and others. He had no previous experience in
26 it, but it did not take long to get the hang of; there was a single handheld camera
27
28

1 and the shoots were very formulaic. It started with a clothed interview of the
2 model, followed by a pre-arranged set of sexual positions, and ended with a post-
3 shoot interview of the model.
4

5 He would return to the office and transfer the footage to the local computer.
6 Pratt did most of the rest – editing the footage and putting it online – though on
7 occasion Mr. Wolfe would upload the footage at Pratt’s request. Mr. Wolfe had other
8 tasks, for example, setting up Craigslist ads to begin the process of finding models,
9 handling payroll issues for tax purposes, and making sure 1099’s were properly
10 issued to the models. But he had no contact with the women who responded to the
11 ads until they arrived at the hotel for filming, as Pratt and others handled those
12 communications.
13
14

15 **B. Girls Do Porn/Girls Do Toys**

16 Before continuing, Mr. Wolfe wants the Court to know he does not shirk from
17 full accountability for his decision to participate in this offense. He has read the
18 transcripts of previous sentencings, he has seen victim impact statements, and he
19 recognizes the devastating and lasting impact on the women involved. He wishes
20 with every fiber he could change the past, and acknowledges he faces a substantial
21 sentence based on his conduct and his guilty plea.
22
23
24

25 At the same time, it is important for the Court to have a more complete
26 picture of the offense, his relationship with Pratt, and his actual conduct.
27 Therefore, Mr. Wolfe asks the Court to consider the following as relevant to
28

1 determining an appropriate sentence.

- 2 • **Mr. Wolfe was not particularly close to Pratt, nor was he his right-**
3 **hand man.**

4 As mentioned above, Mr. Wolfe was not a close friend of Pratt's. They were
5 childhood friends who had taken different paths. When Pratt asked him to move
6 to the States, it was not out of friendship but because he thought Mr. Wolfe's
7 computer skills would be helpful. He did not share his personal life with Mr. Wolfe
8 or confide in him in any meaningful way.
9

10 As anyone connected to Pratt would confirm, Pratt was not a particularly
11 well-liked individual. He didn't seem to have personal friends, and was known for
12 his quick temper. Indeed, he was so prone to smashing keyboards and kicking holes
13 in the office door that Mr. Wolfe had a drywall repairman on speed dial.
14

15 As for the Girls Do Porn (GDP) business, it was Pratt's business. He was the
16 100% owner, he was the boss, and he made all meaningful decisions. Mr. Wolfe,
17 like other employees, was tasked with carrying them out. And at no point was Mr.
18 Wolfe the CEO or CFO of GDP; Mr. Wolfe does not know how the PSR came to
19 include that information. See, e.g., PSR ¶ 217. Nor did Mr. Wolfe run the day-to-
20 day operations; again, Pratt called all the shots.
21

22 In truth, Pratt would never have a right-hand man or a true second in
23 command; it was entirely his show, with everyone else in a supporting role. As an
24 example, at one point an employee called in sick. Mr. Wolfe took the call and
25 informed Pratt. Pratt flew off the handle, yelling that only he was in charge and
26
27
28

1 no one else had the right to handle any employee matters.

2 • **Mr. Wolfe was not wealthy or well compensated.**

3 Pratt made millions of dollars as the owner of GDP. He owned a multi-
4 million-dollar home in Rancho Santa Fe. He drove a \$600,000 Lamborghini and a
5 \$250,000 Mercedes.
6

7 Mr. Wolfe, in contrast, was initially paid \$500 per week. He rented an
8 apartment, and his car was a nearly 20-year-old GMC Yukon he bought on
9 Craigslist for \$5,000. While he later switched over to hourly consultant fees, at
10 most he was earning a few thousand dollars per month.
11

12 It is true that Pratt eventually offered Mr. Wolfe a half-owner interest in his
13 spinoff business, Girls Do Toys (GDT). But it quickly became clear that was an
14 illusory “offer,” designed only to keep Mr. Wolfe in the fold. Before the man-woman
15 video shoots (and sometimes after), the women would be offered additional
16 compensation to perform a solo video with sex toys. But Pratt never built up GDT;
17 instead, he would include the videos for his GDP subscribers, and as such the Toys
18 brand was unsuccessful at generating independent subscribers or profits. At most
19 it generated a few thousand dollars per month, which all went back into expenses.
20
21 As such, Mr. Wolfe never got *any* money from that business.
22
23

24 • **Civil litigation.**

25
26 In 2016, the Jane Doe lawsuit was filed. Pratt and his lawyers handled the
27 case. Mr. Wolfe’s main role was to provide the attorneys documents when they
28

1 needed them; he also was designated as a company representative for deposition
2 purposes. He was not involved in the legal strategy or coordinating a defense.

3 Further, the PSR incorrectly alleges the scheme continued after litigation
4 commenced. Not so. Mr. Wolfe met with the attorneys and together they convinced
5 Pratt to change the model. Going forward, the models were told the videos would
6 be on the internet.
7

8
9 During the litigation phase of the civil case, Pratt traveled to Europe. At the
10 time, no one was aware of the government's criminal investigation. The case
11 involved a civil dispute revolving around a single issue: the women's knowledge of
12 where the videos would be distributed.
13

14 Perhaps Pratt had some foreknowledge or instinct telling him to run, but as
15 far as Mr. Wolfe knew, Pratt was simply taking a personal trip to Europe. And
16 once there, contrary to the allegation in the PSR, Mr. Wolfe did *not* take over the
17 company. Rather, Pratt continued to run it, giving direction to his employees
18 including Mr. Wolfe remotely.
19

20 Nor did Mr. Wolfe assist Pratt in moving moneys offshore. Mr. Wolfe had
21 some access to bank accounts because he ran payroll, but Pratt had full access to
22 the accounts from anywhere in the world. Mr. Wolfe did not have authorization to
23 move sums overseas for Pratt, nor was he directed to, nor did he. If Pratt did those
24 things, it was without Mr. Wolfe's assistance.
25
26
27
28

Allegations in the PSR

1
2 There is no doubt this is a serious case; the admitted conduct is sufficient for
3 the Court to meaningfully exercise its sentencing authority. But the PSR goes well
4 beyond that, and Mr. Wolfe must address some of its more troubling allegations.
5

1. The women knew this was pornography *before* traveling.

6
7 The PSR got it right when it stated the women who responded to modeling
8 ads received responses indicating that the actual job would be to make
9 pornographic videos. PSR ¶ 7. Every woman who responded received an email
10 immediately informing them the work was not basic modeling but adult video
11 pornography. This was a typical response email:
12
13

14
15 To: [REDACTED]
16 From: Jonathan N
17 Sent: Thur 9/26/2013 10:52:22 PM
18 Subject: Re: Minneapolis's Hottest Girls Get Paid Now-\$3000 (Rancho Santa Fa, CA)
19
20 Hello, thank you for expressing interest in our ad , we receive many applicants, but only a select few get
21 this reply as we are very picky about who we work with.
22
23 This is a legitimate adult gig for an established Southern California company. You will make \$2000 CASH
24 for your first shoot which is paid up front, consistent work is also available, we offer solo toy scenes for
25 \$1000. You can do BOTH scenes in one trip for \$3000.
26
27 This is a 30 minute adult video. Only the producer and talent are present during your shoot.
28 All shoots are held at a luxury upscale location with only 3 people, the male model, the director and
yourself.

23 Unsurprisingly, many opted out. Those who remained interested sent naked
24 pictures and then entered into negotiations with Pratt (or Andre “Dre” Garcia, and
25 *not* Mr. Wolfe, who was never involved in the recruiting stage of the business
26 beyond helping with uploading the modeling ads).
27
28

1 If both sides agreed, Garcia or Pratt would book round-trip tickets and a hotel
2 for the women and would email them their round-trip travel itinerary and hotel
3 confirmation. She would be picked up at the airport, taken to have makeup done,
4 and brought to the hotel where she would sign a contract and perform the shoot
5 under studio lighting and a professional studio video camera.
6

7 This brief summary is important because it is not consistent with some of the
8 women's statements to the agents or the Court that they were not told it was
9 pornography until arriving in San Diego. But as the emails show, that's not what
10 happened. The business was designed to make money, and it would be a terribly
11 unprofitable model to hope women could be cajoled or pressured into having sex on
12 camera at the last minute. Much of the time that would not work out, an expensive
13 proposition for Pratt.
14
15

16
17 **2. The women were not forced to do solo shoots for Girls Do Toys.**

18 Along those lines, the PSR includes allegations that some of the models were
19 not told about, and forced to do, solo videos (for Girls Do Toys) after they finished
20 their male-female video. That too is not accurate. In the initial recruitment email
21 screenshot shown just above, the women were told upfront they could make
22 additional money for a second solo shoot ("we offer also solo toy scenes for \$1,000.
23 You can do both scenes in one trip for \$3,000").
24
25

26 Many chose to do so, many did not, which is consistent with the records
27 maintained by Pratt's business; approximately one-third of the women agreed to do
28

1 another shoot. And the fact that some did a second scene, and some did not, is also
2 consistent with the women having an actual choice. And if they had a choice, their
3 agreement to participate in two (or in some cases three or more) videos, is also
4 inconsistent with subsequent allegations of assault. Along those lines, the same
5 can be said of the numerous women who agreed to serve as “reference girls” for
6 GDP and to speak with other women thinking about participating.
7

8 **3. Mr. Wolfe’s role in filming videos.**

9
10 Mr. Wolfe was the cameraman in about 10-15% of the videos. He would arrive
11 at the hotel room and set up the camera and studio lighting. (He notes that there
12 was no intention of blocking doors to prevent egress. Space was always limited;
13 sometimes the empty lights and camera boxes were placed by the door simply
14 because that’s where there was room.) He would meet the women, verify their age,
15 go over the forms, and conduct a pre-shoot interview. He knew that Dre Garcia
16 smoked marijuana, but he never saw a woman model under the influence nor would
17 he countenance that. He also made sure the women were comfortable before and
18 during the filming.
19
20
21

22 Like a script, each position was pre-arranged by Pratt, who expected that
23 each video would follow the same script. The positions would be discussed on-video
24 in the preliminary interview, and during filming Wolfe or Dre would tell the women
25 which position was up next. After a few minutes in each position there would be a
26 short break. The women had their phones and access to the bathroom. They didn’t
27
28

1 call the police during or after filming; many agreed to return for subsequent videos,
2 and some agreed to serve as “reference girls” to help recruit other models.

3 From Mr. Wolfe’s perspective, the women were friendly and active
4 participants in the shoots. One or two decided not to go through with the filming,
5 and Mr. Wolfe had no problem canceling the production on the spot. Those who
6 participated, from outward appearances, did not seem in distress.
7

8
9 The PSR identifies troubling conduct and observations on certain videos. As
10 we informed the Court, undersigned counsel persistently sought to verify that the
11 defense had copies of the identical footage as the government. The parties met and
12 conferred repeatedly, and counsel is now confident the parties are in possession of
13 the same videos. Despite the allegations in the PSR (paragraph 58-60), the videos
14 do not contain the violent imagery described. There were not cries of pain,
15 vomiting, or painful tears. It is true during a post-sex interview, one of the women
16 said “My vagina hurts a lot,” but the PSR’s description is misleading because her
17 *actual* statement was, “*The sex was awesome! My vagina hurts though, a lot,*”
18 followed by statements of how she enjoyed being filmed. And in her post-sex
19 interview at the end of the filming, that woman says she “loved it, really exciting,”
20 and when asked if she would do it again, replied “Absolutely!”
21
22
23
24

25 Indeed, those comments were consistent throughout the post-performance
26 interviews. As such, they provide insight into how Mr. Wolfe would have perceived
27 their experience. Virtually every interview contained comments like the following,
28

1 which are taken verbatim from different videos:

- 2 • “It was better than I thought it was going to be.”
- 3 • “It was a lot more comfortable than I thought it would be.”
- 4 • “So you had a good time?” “Yeah, I did.” “Would you do it again?” “Yeah, I
- 5 would. Definitely.”
- 6 • “How was it?” “It was thrilling.”
- 7 • “I enjoyed myself and I had fun.”
- 8 • It was “a lot less intimidating than I thought it would be. I was a lot more
- 9 comfortable than I though I would be.”
- 10 • Being filmed “is a little weird, but I like it.”
- 11 • “It was fun.” “It was empowering.”

12
13
14
15 Again, Mr. Wolfe acknowledges that the women were paid performers, and
16 may not have been sharing what they actually felt. Still, it is understandable for
17 someone like him to take their comments at face value. And in any event, the
18 defense could not locate a single interview in which a woman said anything
19 negative about the experience or appeared in distress.
20
21

22 Returning to the videos, there was only one time a woman asked Garcia to
23 stop. She tried to do a sexual position she had never done before, and she said
24 “stop, it’s not going to work,” and he stopped. She offered to try a second time and
25 again said to stop it’s not going to work, and again Garcia stopped. That was it; no
26 one forced her to continue doing this act against her will.
27
28

1
2 At the end, Mr. Wolfe pleaded guilty to sex trafficking by fraud, *not* by force,
3 coercion, or violence. The plea agreement does not contain any admissions to
4 violent conduct on the videos, nor is the government (or Probation) seeking any
5 guideline enhancement based on the contents of the videos.
6

7 There is no doubt the women were induced to participate via false pretenses.
8 That is a terrible thing to do, there is clearly accountability for it, and Mr. Wolfe is
9 truly remorseful. That is the conduct Mr. Wolfe should be punished for, not for
10 allegations outside the indictment or plea agreement.
11

12 **4. Personal allegations against Mr. Wolfe**

13 To that end, Mr. Wolfe respectfully disagrees with the allegations he
14 personally sexually assaulted anyone during any of the shoots. He points out, for
15 example, that two of the women who say he assaulted them later agreed to serve
16 as “reference girls” for GDP. It is hard to fathom that someone who went through
17 a harrowing assault would later agree to receive \$50 or \$100 for a phone call to tell
18 another young woman about the great experience she had with GDP.
19
20
21

22 **5. Porn Wikileaks**

23 As we know, many of the women were “doxed,” that is, identified publicly,
24 leading to any number of negative consequences in their lives. The PSR’s assertion,
25 however, that GDP or Mr. Wolfe had anything to do with their doxing is mistaken.
26
27
28

1 The evidence produced during the civil litigation showed it was the opposite.
2 There are people who take pleasure in identifying porn actors, perhaps to try to
3 shame others from participating. There is a name for them, “porn trolls.” They
4 surf the internet and try to match up porn actors with Facebook or other social
5 media posts. And when they identified someone, they would dox them online and
6 would upload the details to the Porn Wikileaks website.
7

8
9 Porn Wikileaks was bad for Pratt’s business. He tried to protect the women’s
10 identities, and he actually would pay money to Porn Wikileaks to have them take
11 the names down. Girls Do Porn filed a Digital Millennium Copyright Act (DMCA)
12 lawsuit against Porn Wikileaks after it extorted them for \$20,000 and still refused
13 to take down information. (GDP also routinely filed DMCA notices against any
14 website that stole their videos, thus limiting the availability of these videos online.)
15

16
17 Later Pratt, through GDP, paid to obtain access to the Porn Wikileaks
18 website, so he could *take down* the doxing information on its models. The fact that
19 GDP made such payments to Porn Wikileaks fueled speculation it was involved in
20 perpetuating the doxing though, in reality, it was the other way around.
21

22 **The sentencing guidelines and an appropriate sentence.**

23 **A. The plea agreement**

24
25 Turning to the Guidelines, the parties are in agreement as to the preliminary
26 calculations: base offense level 14, +20 for uncharged conduct/multiple victims, +2
27 for role, -3 for acceptance. (His objections are pending but Mr. Wolfe expects
28

1 Probation will recommend sustaining the objection to the base offense level after
2 reviewing the *Wei Lin* case.)

3 At Criminal History Category I and an adjusted offense level of 33, the
4 sentencing range is 135 to 168 months.
5

6 **B. The zero-point offender departure**

7 We will discuss an appropriate sentence momentarily, but there has been a
8 guideline change since the parties entered into the plea agreement. The new
9 section 4C1.1 provides a two-level downward departure for certain zero-point
10 offenders. The only disqualifier potentially applicable is subsection 10, which
11 requires that the defendant did not receive a role adjustment *and* was not engaged
12 in a continuing criminal enterprise. (Subsection (a)(5) says the instant offense
13 cannot be a “sex offense,” but subsection (b)(2) defines “sex offense” as an offense
14 “perpetrated against a minor,” inapplicable here.)
15
16
17

18 The question is whether Mr. Wolfe’s 2-level role enhancement precludes him
19 from the departure or whether he is only ineligible if he played an aggravating role
20 *and* was involved in a continuing criminal enterprise. The Ninth Circuit has not
21 ruled on the matter yet. Mr. Wolfe suggests that, like the safety valve provision
22 interpreted in *United States v. Lopez*, 998 F.3d 431 (9th Cir. 2021), the “and” in
23 subsection (a)(10) means someone is ineligible on that ground only if they are both
24 subject to a role enhancement and was engaged in a CCE.
25
26

27 With the § 4C1.1 departure, the offense level would be 31, and a range of 108-
28

1 135 months.

2 **C. An appropriate sentence**

3 As the Court knows, the guidelines are one of the 3553(a) factors, and
4 ultimately the Court must impose a reasonable sentence, sufficient but not greater
5 than necessary to comply with the federal sentencing goals.
6

7 Before discussing the mitigating factors, Mr. Wolfe pauses to assure the
8 Court he has spent four and a half years reflecting on his decision to become
9 involved in this offense. He recognizes his involvement in a very destructive
10 business is indefensible and totally inconsistent with not only the values he was
11 raised with but also with how he has behaved in virtually every other aspect of his
12 life. He knows the Court must wrestle with, and reconcile, this disparity. He
13 assures the Court that going forward he will never again be involved in anything
14 like this.
15
16
17

18 Mr. Wolfe suggests these are some of the most pertinent factors in
19 determining an appropriate sentence:
20

- 21 • His history and characteristics are positive. He was raised in a working-
22 class family by loving parents, though his parents' divorce was traumatic
23 and challenging for him and his sister Ella.
- 24 • He was a good student and before moving to the United States had
25 established a record as a trustworthy, responsible, and well-regarded hard
26 worker in several jobs.
27
28

- 1 • He has no history of drug or alcohol abuse, violence, or involvement in
2 gangs. He has no prior criminal record, not even a traffic ticket.
- 3 • He has a loving relationship with his long-term girlfriend Shannon, and
4 voluntarily took on a fatherhood role with her firstborn son even though
5 he was not the biological father. He is by all accounts an involved and
6 loving father to his boys.
- 7 • Mr. Wolfe had no prior involvement in the porn industry. He was
8 recruited by a childhood classmate to do back-end computer work.
- 9 • At GDP, he was not an owner or principal. He initially received a small
10 stipend - \$500 per week – and later became an hourly independent
11 contractor. His take home pay was modest, particularly in comparison to
12 Pratt, who made and kept millions of dollars and lived ostentatiously.
- 13 • He did not recruit the women and did not initiate the lies. That was
14 primarily Dre Garcia’s role, along with Pratt, though he once again
15 acknowledges participation in the scheme.
- 16 • He acknowledges the pain the women experienced since they were exposed
17 online. At the time he filmed the shoots, he did not perceive any violence
18 or improper conduct. In the post-sex interviews, the women expressed
19 satisfaction with the experience, as discussed above, and none said they
20 were in pain or unhappy. (He acknowledges they may have felt otherwise
21 but that is what they conveyed.) Many of the women agreed to film a solo
22
23
24
25
26
27
28

1 shoot with toys, agreed to be a reference girl, and many agreed to return
2 a second or even third time for another male-female encounter on film.
3 Some even agreed to do adult videos for other companies.
4

- 5 • Sentencing disparity. Three of the co-defendants bear discussing:
 - 6 ○ The Court imposed a 20-year sentence for Garcia. Garcia was
7 actively involved in recruiting women, often their first and only
8 point of contact, routinely and repeatedly lying to them directly over
9 the phone, via text messaging, and in person.
10
 - 11 ○ Garcia was also the main actor, so the women have terrible
12 memories of extensive physical contact with his body. He also
13 sexually assaulted many of them before or after the videos; a fact
14 unknown to Mr. Wolfe until he was charged in this case. Garcia may
15 have provided some of them with drugs and alcohol. He also had a
16 prior criminal record. Unlike Mr. Wolfe, he pleaded guilty to two
17 charges including the minimum mandatory 15-year substantive
18 offense. And unlike Mr. Wolfe, he will be released in the United
19 States, so the Court had to consider safety of the community,
20 considering how young he is now. The Court imposed 20 years.
21
 - 22 ○ The Court imposed a 4-year sentence on Mr. Gyi. Like Mr. Wolfe,
23 Gyi was primarily a cameraman, though he did other tasks like
24 drive women to and from the airport, and some backend work as
25
26
27
28

1 well. He was in it for a shorter period, and moved on with his life
2 before the prosecution commenced. He also had a significant
3 substance abuse problem which he took steps to address before his
4 prosecution. While his situation is more mitigated than Mr. Wolfe's,
5 it is a good starting point since their conduct was similar and
6 overlapping.
7

8
9 ○ Finally, Pratt. He left the country and became a fugitive. He
10 designed, operated, and controlled the entirety of the operation. He
11 was arrested in hiding in Spain and will be extradited any day now.
12 He will undoubtedly receive the longest sentence should he be
13 convicted.
14

15 ○ Mr. Wolfe is no Michael Pratt, but he is not Dre Garcia either. He
16 suggests he fits somewhere between Gyi and Garcia, and should
17 receive a substantially lower sentence than Garcia. The
18 government's commitment in the plea agreement to recommend the
19 midrange of level 33 (135-168 months) – a little more than halfway
20 between the Gyi and Garcia sentences of 48 and 240 months –
21 reflects a similar assessment, particularly since the parties entered
22 into the plea agreement over a year *after* Garcia's sentencing.
23
24

- 25
26 • Other cases provide proportional sentencing/sentencing disparity context.
27 In this district, for instance, there have been several cases involving gang
28

1 members who were pimping out young and underage women. Such cases
2 involve threats and violence, isolation, control, emotional abuse, and long-
3 term psychological manipulation. The women were forced to perform sex
4 acts on dozens or hundreds of strangers, and were forced to turn over all
5 the money to their pimps. The sentences imposed have generally been far
6 lower than the 150-month sentence recommended by the government
7 here. In the examples below, the defense believes the conduct was far
8 worse than this case, where the offense involved fraud and not violence,
9 and the defendants had much worse personal characteristics than Mr.
10 Wolfe. Despite being worse conduct, in two of the cases, the sentences
11 were lower, and in the third, the sentence was somewhat – though
12 justifiably – higher. A brief summary of these cases follows.

- 13 ○ *United States v. Pittman* was one such case. 13cr4510-JAH. It was
14 a large-scale RICO prosecution encompassing conduct occurring for
15 more than 15 years. The lead defendant, Pittman, was a member of
16 the Black Mob criminal street gang. He pimped out numerous
17 women, and admitted robbing and assaulting some of them. He
18 pleaded guilty and Judge Houston imposed a 132-month sentence.
19 See [https://www.justice.gov/usao-sdca/pr/north-park-gang-member-](https://www.justice.gov/usao-sdca/pr/north-park-gang-member-sentenced-11-years-prison-his-leadership-role-racketeering)
20 [sentenced-11-years-prison-his-leadership-role-racketeering.](https://www.justice.gov/usao-sdca/pr/north-park-gang-member-sentenced-11-years-prison-his-leadership-role-racketeering)
21

22 Pittman was the only defendant to receive a sentence exceeding ten
23
24
25
26
27
28

1 years.

2 ○ Judge Houston also sentenced another high-level gang member,
3 Corey DeShawn Austin, a leader of the Westside Crips, for a multi-
4 year racketeering conspiracy focusing on prostitution (and
5 continuing when he was in state prison while using a contraband
6 cellphone directing subordinates). 17cr270-JAH. The RICO charge
7 Austin pleaded guilty to included as a target offense sex trafficking
8 by force, fraud, and coercion. *See* docket entry 219 (indictment) at
9 13. Austin’s sentence was 82 months. *See*
10 [https://www.justice.gov/usao-sdca/pr/westside-crips-gang-member-](https://www.justice.gov/usao-sdca/pr/westside-crips-gang-member-sentenced-82-months)
11 [sentenced-82-months.](https://www.justice.gov/usao-sdca/pr/westside-crips-gang-member-sentenced-82-months)
12
13

14 ○ Finally, and more recently, Judge Robinson had the case of Kevin
15 Lamont Beal, 21cr1565-TWR. Beal pleaded guilty to 18 U.S.C. §
16 2422(b) (coercion and enticement of a minor) based on transporting
17 underage girls and adult women for the purposes of prostitution for
18 more than two years. He would post advertisements online to pimp
19 them out, and forced them to walk the streets seeking “johns.” He
20 admitted using violence against one of his victims, “striking her
21 multiple times in the face causing serious bodily injuries.” *See*
22 [https://www.justice.gov/usao-sdca/pr/long-time-sex-trafficker-](https://www.justice.gov/usao-sdca/pr/long-time-sex-trafficker-sentenced-more-15-years-prison)
23 [sentenced-more-15-years-prison.](https://www.justice.gov/usao-sdca/pr/long-time-sex-trafficker-sentenced-more-15-years-prison) Beal had “a long criminal past
24
25
26
27
28

1 involving state convictions for pimping and pandering from 2012
2 through 2019.” *Id.* Judge Robinson imposed 188 months.

- 3
- 4 • Mr. Wolfe has remained in local custody since his arrest in 2019. That
5 means he spent the entirety of the pandemic in a crowded pretrial jail
6 facility (GEO), which was no easy feat. Throughout this time, however,
7 he has not sat idly. As his family’s letters explain, he has devoted himself
8 to his education, and has been working on his computer programming
9 skills. He also worked as an orderly at GEO for more than two years,
10 rating excellent in every category. (*See* GEO letters, attached.). Case
11 Manager Hartley confirms there “have been no disciplinary incidents,”
12 says Mr. Wolfe has “displayed utmost respect” to everyone, has donated
13 books to the library, and has even proposed teaching courses to his fellow
14 inmates. *Id.* Such conduct, along with his involvement with his children
15 here and family in New Zealand, demonstrates post-arrest rehabilitation,
16 which is always relevant at sentencing.
 - 17 • Because he is subject to deportation, Mr. Wolfe will not receive First Step
18 Act credits – or any early release benefits – and thus will serve 85% of his
19 sentence. By comparison, Dre Garcia will likely serve approximately
20 2/3rds of his sentence before release (and will likely go to a halfway house
21 six months before that). So Garcia’s 20 year sentence will likely result in
22 actual incarceration of around 13 1/2 years once he earns all his credits.
23
24
25
26
27
28

1 That would be roughly equivalent to a 15-year sentence without First Step
2 Act credits, as 85% of 15 years is nearly 13 years. Considering that
3 Garcia's conduct was substantially worse than Mr. Wolfe's, a
4 proportionately lower sentence is in order.
5

- 6 • Mr. Wolfe's deportation also means the Court need not lengthen his
7 sentence to protect the public. He will not be a member of the public at
8 any time in the future, since he will be sent across the world and barred
9 from reentry. For the same reason, the Court need not lengthen his
10 sentence to provide specific deterrence; similarly, his lack of record, lack
11 of substance abuse, and his family ties also show a diminished need for
12 specific deterrence.
13
- 14 • While section 3553(a) includes many factors, the need for vengeance is not
15 one of them. Mr. Wolfe understands a case like this is emotionally
16 challenging, and yet the point of a civilized criminal justice system is to
17 mete out justice dispassionately without deferring to the cries for
18 retribution from the victims.
19
- 20 • Finally, the parties worked hard to resolve the case, and as part of that
21 resolution agreed the applicable guideline range provided sufficient
22 latitude to incorporate an appropriate sentence. The government is
23 recommending mid-range, 150 months. Mr. Wolfe is recommending the
24 low-end, after incorporating the § 4C1.1 departure, 108 months. Even if
25
26
27
28

1 the Court finds the zero-point offender inapplicable, it is still a reasonable
2 sentence under the 3553 factors.

- 3 • Under the plea agreement, Mr. Wolfe has waived appeal up to 180 months.

4 Because everyone involved deserves finality, he urges the Court not to
5 exceed fifteen years.
6

7 Conclusion

8
9 This has been a long and difficult road for everyone involved. Mr. Wolfe once
10 again apologizes to the Court, to the victims, to his family, and to the public. He
11 thanks the Court for considering his case, and respectfully asks the Court for a 9-
12 year sentence, less than the government recommends but certainly a long stretch
13 for any first-offender. He also asks for a recommendation he serve his time in the
14 western region to facilitate family visits, and specifically at Terminal Island, where
15 he can also receive treatment for his sleep apnea. Finally, given that he will be
16 deported after he finishes his time, Mr. Wolfe requests the Court impose 5 years of
17 supervised release.
18
19
20

21 Respectfully submitted,

22 Dated: March 12, 2024

23 s/ Jeremy Warren
24 Jeremy Warren

Attachments

- GEO Counselors correspondence
- Support letters



GEO Secure Services
Western Region Detention Facility
220 West C Street
San Diego, CA 92101

www.geogroup.com

August 1, 2022

To Whom It May Concern,

Matthew Wolfe was hired at our facility in the capacity as a housing unit orderly on February 18th, 2020. He was promoted to a food service worker on October 15th, 2021 due to his exceptional work ethic. On his 30-day work evaluations, he rates 'excellent' in all categories. These positions involve interacting with staff on a daily basis in which Mr. Wolfe has displayed the utmost respect to others. He has donated a surplus of books to our facility library and has proposed teaching educational courses to the detainee population (unfortunately, we can't accommodate this suggestion). To date, there have been no disciplinary incidents on file.

Sincerely,

A handwritten signature in black ink that reads "T. Hartley". The signature is written in a cursive, flowing style.

T.Hartley, Case Management Coordinator



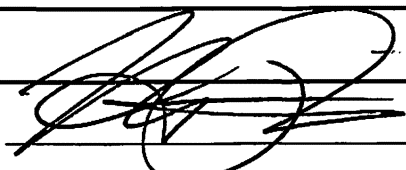
**WESTERN REGION DETENTION FACILITY
WORK PERFORMANCE EVALUATION**

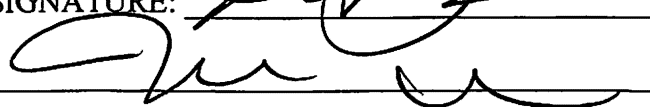
DATE: 11/12/21

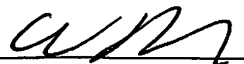
Department/Job Title:	FOOD SERVICE/DISH WASHER	Hire Date:	10/15/21
Name:	WOLFE, MATTHEW (A 720-06)	I.D.#:	89771298

	Excellent	Good	Average/Fair	Needs Improvement	Unacceptable
1. Attitude: Displays positive attitude toward job, supervisor and co-workers.	Comments: ✓	Comments:	Comments:	Comments:	Comments:
2. Quality of Work: Demonstrates diligence and thoroughness in performing assigned tasks.	✓				
3. Dependability: Works harmoniously and effectively. Gets along well with others.	✓				
4. Productivity: Constantly produces as expected.	✓				

General Comments/Competencies Acquired:

FLOOR/WORK SUPERVISOR SIGNATURE: 

COUNSELOR SIGNATURE: 

DETAINEE SIGNATURE: 



Western Region Detention Facility
220 West C Street
San Diego, CA 92101
www.geogroup.com

December 23, 2021

Detainee Wolfe, Matthew (#89771298), we thank you and appreciate the donation you made of a book(s) to the Geo Library. We will use your donation to expand our literature options in the facility library.

Sincerely,

A handwritten signature in black ink, appearing to be "J. Del Rio". The signature is written over the typed name and title of the sender.

J. Del Rio
Correctional Counselor



Western Region Detention Facility
220 West C Street
San Diego, CA 92101

TEL: 619.232.9221
Fax: 619.232.9224
www.geogroup.com

November 5, 2021

To Whom It May Concern,

Detainee Wolfe, Matthew (USMS # 89771298) was hired at our facility in the capacity as a Food Service Dish Washer on 10/15/2021 and has no disciplinary reports to date.

Sincerely,

A handwritten signature in black ink, appearing to be "J. Del Rio". The signature is written over the typed name and title.

J. Del Rio,
Correctional Counselor.

J. Del Rio
Correctional Counselor

Point Cook

██████████

AUSTRALIA

28th January 2024

Attention: Judge Sammartino

Your Honor,

Re: Matthew Isaac Wolfe

The purpose of this letter is to give you an insight into the true person that Matthew Wolfe is.

Matt and I grew up in Christchurch, New Zealand in your average, hard-working, middleclass family. Being my older brother, he has played a large role in my childhood. He was encouraging, supportive and taught me to always be kind and see the good in people. We attended the same primary and high-schools and have many mutual friends. At school he was trustworthy, well liked and respected by both teachers and peers.

After we finished school, Matt and I moved out into a flat together. We were surrounded by a great group of friends who would describe him as genuine, caring and loyal. He maintained full time employment, going above and beyond for his employers who all highly regarded him, as did his colleagues. I, along with many of Matts friends and colleagues, have struggled to reconcile what is being said in the press against the person they know.

Matt and I have been living in different countries for some years now and our bond is stronger than ever. We have maintained our contact via phone and messages and despite the distance I still feel very supported and close to him. He is extremely close with my husband and is a loving Uncle to my children. I am so proud of the Father that he is, and I am honored to be an Aunty to his two incredible sons.

As a family unit, we have found Matt's arrest and detainment incredibly stressful. It has been extraordinarily difficult to navigate Matt's situation from the other side of the globe. We are all constantly worried for his wellbeing and find it very upsetting that we cannot regularly visit him due to the distance. Being so far away means we must rely on updates from Matt himself about his welfare, which we believe leaves Matt in quite a vulnerable position.

From what we hear, Matt has shown incredible resilience during his detainment. Matt keeps in regular contact with our family by phoning and emailing. I cherish hearing his voice and discussing everyday topics such as our children, books we've read and movies we've

watched. If I don't hear from him at least once I week I will begin to wonder if something is wrong and worry for his wellbeing. Thankfully Matt knows we are waiting to hear from him, so he contacts us as much as possible.

We are doing everything we can to support him by topping up his commissary account, sending photos and sending secondhand books so that he can further his education and build some strong foundations for future study. He has had varied interests/requests with the type of books that he has asked me to send, with some examples being computer science, coding, business textbooks, technology, mindset, multiple languages, sign language, stretching/yoga, fitness/health, nonograms (Japanese logic) puzzles, history, biographies and most recently guitar music books. Having access to a guitar at the current facility has brought him joy and we are all pleased to hear about the progress he is making with practicing new songs. I have no doubt that he will continue to work hard to better himself, and that once he is released from custody he will settle back into society and achieve great things.

I am hugely concerned for Matt's inability to live a normal life with his partner and sons. It is devastating to know that he has been unable to be a part of their lives. No words can express the enormous 'gap' that Matt's sons will have due to his imprisonment and that is a sadness we live with every day.

I am equally concerned that if Matt was to be given a long sentence, our parents could die before Matt is released. With both parents in their seventies, it will only become more difficult for them to travel and visit him. Since Matt's detainment, we as a family have come together to try and understand the situation that Matt is in and the American judicial system. The sadness our family feel is enormous, the impact and stress on our parents has been immense. I am still in a disbelief that this is Matt's reality and I grieve for him daily.

Our families love for Matt is limitless and we will always support him. I feel privileged to have Matt as my brother and I love him very much. I will always be proud to be Matt's sister and I know he is a great man with a kind heart.

I hope this letter has provided you with a clear representation of who Matthew Wolfe is.

Yours respectfully,



Ella Ruth Johansson

Phone: [REDACTED]

Email: [REDACTED]

[REDACTED]
Christchurch 8081
New Zealand

20 August 2022

Presiding Judge Sammartino
United States District Court Judge

re: Character reference for Matthew Isaac Wolfe

Dear Judge Sammartino

I am writing this letter in support of my son, Matthew Wolfe, who is due to appear before you.

I am deeply saddened by the predicament Matt has found himself in. This whole situation just does not match with the son I know. I have always been very proud of Matt and to be his mother. Before Matt went to live in the United States, he was never in any trouble with the police or the courts. When I visited a few years ago, Matt told me that he was working in the adult entertainment sector and when I questioned him, he confirmed for me that it was a legitimate business and totally legal.

When I have visited Matt and Shannon, Roman and now their son Reign, in San Diego, it was lovely to see Matt with his own family and being a caring, wonderful partner and father to his boys. The excitement the boys had every day when Matt returned home from work was heart-warming. Matt was totally involved with their care, both in the mornings before leaving for work and then helping with bath and bedtime routines in the evening. In Matt I saw a loving partner and father. We shared some wonderful times when I visited and, at home in New Zealand, we proudly display photos of Matt, Shannon and their boys.

Growing up Matt really struggled when his father and I separated. He was only 9 years old and I always felt this was a terribly difficult time in his life. After always having such a close bond with him, he seemed to withdraw and wasn't able to share his feelings or willing to take part in any counselling that may have supported him with this major life event. As a teenager and in the years since, he has always been a wonderful support to his younger sister and was especially supportive when she struggled through some very difficult times, including when her close friend was killed at the age of 14 in a jet ski accident. Matt's support to her was extremely important and offered some stability as they were having to go between both my home and their father's home in shared care. When my mother died, Matt was of huge support to me and a strength I leaned on. He helped with arrangements for her funeral and was a pallbearer for her.

Matt never hurt anyone or got into any fights in his growing years. He was likeable, loving and trustworthy. His teachers throughout primary and secondary school liked him and there were never any issues or concerns. He loved cricket, tennis and golf and his sports coaches recognised his skills. They suggested he join competitive teams but he declined. It seemed to us that he could not see the potential in himself that others could see and tried to encourage. His secondary school teachers recommended him on a work experience programme with a secretarial college. After doing a course there as a student, he was offered a full-time job as a tutor and became a well-respected employee at the college. Later he obtained his bar license and became a bar manager, managing a large bar in Christchurch and was also involved with installing their complex security system. He again proved himself to be a well-respected, honest employee and a law-abiding citizen. He had also worked for Vodafone where he did well as a team member.

During Matt's later teenage years and early 20's we did express to him if we had concerns about some of the friends he made. We felt at times that he made poor decisions with some of his friendships. However, he also had very close wonderful friends, who are still supportive of him today.

When the earthquakes hit Christchurch in 2010-2011, Matt was living with us. When the fatal February 2011 struck, he was working at Vodafone in a shopping mall not far from home. He stayed longer at the mall helping distressed people get out of the mall safely. When he came home, he got stuck in with the huge job of cleaning up as our home had been severely damaged, including clearing collapsed chimney bricks which had fallen into rooms. It was a devastating time for us all and the continued earthquakes throughout the year took their toll on our coping ability. Matt made the decision to leave Christchurch later that year and go to America.

Now we are all faced with this unthinkable situation that Matt is in. It was devastating when we were told of Matt's arrest and these last years have been so emotional and stressful and difficult to come to terms with.

He has phoned us regularly and sounds okay, so I am sure he is choosing times to call when he is not struggling so that he doesn't upset me. As a family we have supported him with access to books and he is an avid reader, mostly non-fiction, biographies, instructional type books and he regularly shares with us what he has been learning. He told us that the facility library didn't have a technical section and he donated books that he had finished and built up a section for the benefit of the other inmates. I have been proud that, even during these years of being incarcerated, he has been focussed on his health, keeping fit, and learning through reading. He supports us over the phone when we have any difficulties using our computer and helps talk us through any issues that we don't understand. He is very keen to obtain some recognised education and we have been investigating this in New Zealand for him. We are hopeful that he will be able to register with an educational institute and gain some formal qualification to support him in moving forward. I know he will use his future to learn and become a valued member of society.

As his mother, I would never have imagined Matt being on the wrong side of the law in any form. I will always be here for him and will always love him. He is and always will be an important part of our family.

I am hopeful that this letter and others in support of Matt may contribute to leniency, enabling him to start again with his life in a positive direction so that again he can be an active contributor in supporting his partner and their two boys and a valued citizen. I trust this letter may help form a picture of the man I know as my loving son.

Thank you.

Sincerely,



Jan Taylor

Janice Lynette Taylor



[REDACTED]
Christchurch 8081
New Zealand

28 January 2024

Presiding Judge Sammartino
United States District Court Judge

re: Character reference for Matthew Isaac Wolfe

Dear Judge Sammartino

I am writing in support of my son, Matthew Wolfe, who is due to appear before you on 19 March 2024.

Further to my previous letter of 20 August 2022, my husband and I visited from New Zealand in May 2023, and were able to see Matt twice in the Corrections Facility. It was a visit that I was dreading, seeing Matt in such an environment, but also a visit that I was longing for so that I could actually physically see him, give him a hug and have some face to face conversation. It was certainly an emotional time for us but I am so grateful to have had those visits. Matt appeared to be okay and was able to put me at ease. He was pleased to see us and extremely grateful that we had visited. I was relieved to see him as it has been a hugely stressful time for us since Matt was incarcerated. I think this has probably been even more difficult for me as we live so far away and it is not possible to visit frequently. We took his older son with us on one visit and it was so lovely to see their love for each other. It is heartbreaking for us to know that his two boys don't have their daddy with them in their young lives for love and support.

Matt has always had a calm and caring nature. He has always been supportive to any of his family and friends in their times of need. He has never set out to hurt anybody and has never been in any sort of trouble.

Now as he faces sentencing, I am scared of what the future will look like for him. Myself and other close family members will be present in court in our support of Matt. I know he has a lot to offer as a good citizen, he will take responsibility, he is keen to study and learn, and wants to become the best father and partner he can be.

It is my heartfelt hope that he may be viewed with some leniency in sentencing. I totally believe in him and that he will make a positive contribution within his family and society when this ordeal is over.

Thank you.

Sincerely,



Jan Taylor

Janice Lynette Taylor
[REDACTED]



Rangiora 7477
New Zealand

Judge Sammartino

Your Honour,

My name is Rob Wolfe, Father of Matt . Matthew is my first born and is loved and constantly on my mind and it is a matter of personal sorrow that I find myself compelled to correspond with the justice system of the United States of America.

Matt had a good upbringing and we spent every summer camping and fishing and as he got older he would bring his friends to share the experience.. On leaving school he attended a course on computer studies and part way into the course he came home and said that he had been offered a full time job as a trainer. It was the start of his working life.

Matthew was never in trouble and did not break the law he knew right from wrong.He was well thought of by our extended family and employers.

I am writing this letter to tell the court that this man is loved and supported, and that his family stands by him regardless of our shock at the seriousness of the charge he is facing.

On travelling to America I assumed that he was working in the computer industry and that he was applying for your green card. Matt would phone home and over time he met his partner and subsequently they have two wonderful boys our grandchildren.

To his credit I have seen him mature and become a wonderful father to two boys committing to their upbringing with his partner. It is my belief that if Matt had known that the industry that he worked in was illegal he would not have been involved.

The only good news I have had, is that he chose not to flee the country but remained with his American family. Matt is a kind loving person who is well liked and he always made time for other people. We have contact from him when he is able to phone and we do what we can to support him.

We are planning to travel to San Diego with Matt's sister when he is sentenced.

Yours regretfully and sincerely

Robin Alastair Wolfe



[REDACTED]
[REDACTED]
Christchurch 8081
New Zealand

23 August 2022

Presiding Judge Sammartino
United States District Court Judge

Re: Character reference for Matthew Isaac Wolfe

Dear Judge Sammartino,

I am providing this document in support of Matthew Isaac Wolfe, who is appearing before you in your San Diego courtroom for sentencing to the charge he has pled guilty to.

My name is Alan Neville Taylor. I am 69 years old, a retired professional firefighter and Matthew's stepfather.

I first met Matt when he was twelve years old, when his mum and I began seeing each other. Matt and I got on great then, and always have. Although he is not biologically mine, I love him and care for him as my son and so, at this time, I am struggling with the reality of his present circumstances.

When we met, Matt and his sister were sharing two homes between his mum and his dad's houses and that caused an emotional and social disruption at times for them.

At that time, I found him quiet and thoughtful and felt, that although he was quiet and a bit reserved, he was coping with the social disruption that split families generate.

As a kid Matt loved computers, was very competent with them and very quickly became everyone's go-to guy for computer fixes.

I saw a young man who everybody liked, but who had a few strong friends. He was loyal to them. Some of the kids were awesome and some were not. Some of the friendships were with kids who his parents struggled with, but the theme I observed was that he seemed to be attracted to people with social issues that he seemed to identify with.

It may have been that some of those kids had similar family issues as his.

He has always had a soft caring side that has evolved over the years as he grew.

For example, when he was about 19 years old, he had a young friend who he regularly brought home to stay over, who obviously had severe alcohol problems.

Matt would not leave him out on the street by himself, took his car keys off him and ensured he slept at home until he could function. That went on for some years until Matt left New Zealand.

Another time, when he went flatting for a couple of months, he returned home with a scrawny disabled cat that he had rescued at a party, from drunken guys who were kicking it around. He hated seeing anyone or anything hurt, and he has been like that all his life. Wobbler the cat grew old with us. Matt has worked a few jobs in different industries. Education, communication, retail, hospitality) and some of his employers have ultimately used his computer skills to their advantage, but not necessarily, his.

An example is a language school that promised to put him through training programmes that would lead to teaching certificates, had him develop and network their computer system but to my knowledge, never carried through with the development training.

In the hospitality industry, he again was supportive of his employer in helping develop their security and camera systems while employed as a bar manager.

The Matt we know, have known and have been watching develop as he grew up, and especially since he has been in the USA, has visually been of a caring, loving and supportive man with his partner Shannon and their now two boys.

Others will perhaps describe a different reality to you, but for me, over these past few years, I have seen our old Matt intellectually growing, becoming a strong, caring and more mature Matt. He has always been kind and caring. I still see that. When he phones us, he is always concerned about how others are and has been positive for us.

The scenario that we, his family now face with his appearance in your court and have now to realise and come to terms with, is diametrically 180 degrees from the boy and the man we know and who has grown up with us.

He has never been in trouble with the police or broken the law. He has never hurt anyone.

Nothing I have written here alters or ignores the information that you have in front of you to consider, on events and activity that we all here at home in New Zealand, struggle to comprehend and which ultimately will determine where his life goes from here.

I am absolutely gutted and so sorry for the women and their families who have been affected and trapped by this 'business'. The whole thing horrifies me. I struggle to see our Matt ruthlessly, knowingly, involved as the charge indicates.

I believe that there is some personal truth and validity to his claims to his mother or the understanding he gave us, his family, that he believed, however, stupidly, that he was working within a legitimate business and within the law.

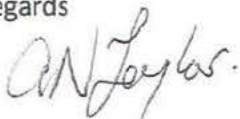
I know the court and justice process will finally educate us on that.

Whatever the outcome, I will stand by him and endeavour to help him do whatever is right and make what amends he can.

His mum and I will be coming to support Shannon, his partner and their children and stand by Matt as we can in the weeks ahead.

Thank you for reading this.

Regards



Alan Taylor

[REDACTED]

Dear Honorable Judge Janis L. Sammartino,

My name is Shannon Bass, and I am the longtime partner of Mathew Isaac Wolfe. Matt and I first crossed paths in the summer of 2011 as neighbors. From the very beginning, I was struck by his down-to-earth nature, honor, humility, and kindness. Our friendship blossomed over the course of a year, and I deeply appreciated his unwavering commitment to achieving the American dream as an immigrant from New Zealand.

My own journey began in Mumbai, India. At the age of 12, my parents and I moved to the USA. Determined to forge my path, I worked tirelessly while attending school, eventually rising to the position of Vice President of Banking at Bank of America by the age of 25. Life took an unexpected turn in 2012 when I became pregnant. The man involved decided he wanted no part in our child's life, leaving me to face parenthood alone.

During this challenging time, Matt's character and sense of responsibility shone even brighter. Our friendship deepened into love, and he promised to stand by my side throughout the pregnancy. When our son was born, Matt embraced him as his own. His devotion to our family was evident to everyone—friends and strangers alike. Despite tight finances, Matt took on the role of provider and protector, ensuring our well-being with every hard-earned penny.

In 2018, our family expanded with the arrival of our youngest child. Together, we weathered life's ups and downs, and every day, I felt blessed by Matt's unwavering love, dedication, and strong work ethic.

We both recognized that Matt had the potential to earn more money. However, as a foreigner, he faced additional challenges in accessing those opportunities. Little did either of us anticipate the compromising position he would find himself in.

Matt was determined to provide everything he could for our sons and our loving family. Unfortunately, what unfolded is something we still struggle to comprehend. Matt was a diligent worker who genuinely believed he was doing nothing wrong. Yet, it has been four long years since this nightmare began.

Our eldest son continues to suffer from nightmares, calling out for his only father figure—Matt. Our youngest child has been denied the chance to know his father fully, missing out on the foundation of love and unwavering devotion that Matt once offered us.

In closing, I implore you to consider the totality of Mathew Isaac Wolfe's character and the unique circumstances that led to this regrettable situation. Matt's unwavering commitment to his family, his resilience in the face of adversity, and his genuine remorse for his actions are undeniable.

Matt has repeatedly demonstrated his willingness to take responsibility for his choices. His clean criminal record underscores his otherwise exemplary life. He seeks not only personal redemption but also the opportunity to contribute positively to society.

As a devoted father, Matt longs to be present for his two boys. Their family unit thrives on love, stability, and the promise of a brighter future. May your judgment be tempered with compassion, recognizing the potential for rehabilitation and the desire to make amends.

Sincerely,

Shannon Bass

THE ROCKPOOL LTD

[REDACTED]
[REDACTED]
August 25th 2022

To whom it may concern

MATTHEW WOLFE

My name is Peter Whittaker, my family have owned and operated The Rockpool, a bar restaurant in Christchurch New Zealand that has operated from 1995 to date.

I employed Matthew as a bar / restaurant manager and technical assistant for three years.

Our business operates several bars in Christchurch; we employ more than 40 people.

Matthew's job as a manager would involve him in running shifts in any one of the bars. Our bars are the biggest bars in Christchurch; we had complete confidence in his ability over a long period to run these, and particularly to comply with our strict sale of liquor act requirements.

He also was involved in CCTV applications with our premises, at the time we had more than 140 cameras in one premise alone.

Matthew was an honest and diligent employee for the three years that he worked for us.

We would have no hesitation in re employing him when he returns to New Zealand.

Yours Faithfully



Peter Whittaker
Director
The Rockpool Limited

Shay McAuley

[REDACTED]
[REDACTED]
[REDACTED]

Christchurch NZ

6 August 2022

Dear Judge Sammartino

RE: Matt Wolfe

I worked with Matt approximately between 2005-2007 at Micky Finns and The Rockpool. I was his manager the entire time.

We had two bars in Micky Finns. The main bar manned with approximately 5 staff and a second bar in a smaller separate area manned by a single staff.

The Rockpool was a late-night bar, getting busy between 2am – 5am.

Matt was a senior barman and worked busy shifts as at the time both Micky Finns and The Rockpool were the busiest bars in Christchurch.

Matt would often manage the staff within the main bar as I was often needed by security to assist with managing crowds and frequent visits from Liquor Licencing agents.

Matt was very trustworthy and reliable. He would also work in the second bar, single handily managing stock, customers, cashflow and security.

I always remember Matt being a great team player and making the shift fun with lots of laughs.

He was a well loved and respected team member.

Yours sincerely

Shay McAuley

Anthony Morales
Lieutenant Commander, USN (Retired)

[REDACTED]
[REDACTED]
[REDACTED]

February 12th, 2024

The Honorable Janis L. Sammartino
U.S. District Judge, Southern District of California
Edward J. Schwartz United States Courthouse
221 West Broadway
San Diego, CA 92101

Judge Sammartino,

May this letter find you in the best of spirit and health, and thank you for your service to our nation.

My name is Anthony Morales and I am writing this character reference on behalf of Matt Isaac Wolfe. First and foremost, please know that I am a Christian and have dedicated my life to Jesus Christ; I volunteer over 30 hours a month supporting Torrey Pines Church and the greater San Diego community. I also honorably served 20 years of active duty in the U.S. Navy before retiring in 2015. During my service, I completed 3 combat deployments to Iraq and Afghanistan as a Naval Flight Officer and completed my military career as the Deputy Chief Engineer for the Space and Naval Warfare Systems Center Pacific. During that tour, I provided leadership to 603 government programs that generated over \$2.1 billion in annual revenue and held the highest security clearances. I am currently employed by the U.S. Government and serve as the Operations Director for the Southern California Tactical Training Range which provides critical combat training services to the entire Department of Defense.

Matt is my friend, and from 2013 to 2019 I have spent quality time with him, his love Shannon, and their sons Roman and Reign. We would regularly meet for dinners and get-togethers where we would talk and share the blessing of family time. I am aware of the charges of sex trafficking, fraud, and conspiracy against Matt and I defer to the court to ensure due process, but I ask that you would also consider my experience with Matt as well. Matt is a gentle soul and these charges are completely uncharacteristic of my understanding of him. Humble, compassionate, respectful, considerate, and devoted to his family are how I would describe Matt's character. For example, when Matt and Shannon met, unbeknownst to him, she was already pregnant with her son Roman. When he learned of the pre-existing pregnancy, Matt decided to support Shannon through that difficult time and adopt Roman as his own. This example of love, compassion, and devotion is one that is rarely, if ever, seen. Moreover, Matt has been an amazing father to both Roman and Reign. I have witnessed over many years how present, engaged, and loving Matt has been with his children and I can say without reservation that they are blessed to have him as their father.

Matt, Shannon, and their children simply desire to continue their life as a family. I believe these recent events have given Matt absolute clarity and he will never place himself or his family in jeopardy again.

Thank you for your time and consideration on this matter.

Very respectfully,



02 August 2022

Attention: Judge Sammartino

Your Honour,

Re: Matthew Isaac Wolfe

My name is Bede Hennessy. I am a Professional based in Christchurch New Zealand.

I have known Matthew Wolfe since 1987, when "Matt" as I know him was 5 years old.

Matt throughout his years has always been an exceedingly kind, well mannered and social person who has maintained good friendships and relationships dating back to high school and lasting to the present day.

These friends including myself know Matthew as a warm and generous person who thinks of others before himself and one who wouldn't hesitate to help others.

Matt is a highly intelligent person who when given an opportunity is extremely reliable and very capable.

I am aware Of Matt's position and not withstanding any errors of judgement that may have been made, this does not accurately reflect Matt's character, nor should it define him.

Simply put Matt Wolfe is a family orientated man with a huge amount to offer his family and society.

Given the opportunity Matt Wolfe will be an asset to this world.

B Hennessy

Cheryl Freathy

[REDACTED]

Escondido, Ca 92026

August 1, 2022

Re: Matt Wolfe

To: The Honorable Judge Janis Sammartino

I am writing this letter in the hopes it will help you to see what kind of person Matt Wolfe is, despite the transgressions that led us all to this point.

I have known Matt Wolfe as a friend for almost 10 years. I have always found him to be extremely kind, dependable and well regarded among his peers. He also has a strong sense of duty to his family and to his friends. Dedicated to his children and to making a good life for them. I believe I am in a position to speak of Matt's moral character, so I hope you will take this letter into account when making a decision on his sentence.

Matt Wolfe is, in short, a good person. It comes as no surprise that he is ready to accept responsibility for his actions.

It must be difficult for you to make decisions like this when you do not actually know the person standing in front of you. Of course, you know that even a good person can make bad choices. I suspect that this was what happened with Matt. I hope you will look at my letter and know that I believe Matt Wolfe to be an honorable individual and a good human being.

Sincerely,

A handwritten signature in cursive script that reads "Cheryl Freathy". The signature is written in black ink and is positioned below the word "Sincerely,".

Cheryl Freathy

Kelly Johnson
[REDACTED]
[REDACTED]
Auckland 0820

26th August 2022

Attention: Judge Sammartino
Re – Character reference for Matthew Wolfe

Your Honour,

By way of introduction my name is Kelly Johnson, and I am a Manager Professional Business at ASB Bank Head Office, Auckland, New Zealand. I have worked in the banking industry for almost 15 years.

I understand Matt has been charged with a single count of conspiracy to commit sex trafficking by force, fraud, and coercion, and I am aware of the facts involved.

I have known Matt for approx. 16 years - we met when I was in my early 20's living in Christchurch, and he is a very close friend of mine. Throughout our friendship, Matt has been reliable, kind, and a stable influence in my life. Someone I turn to for advice, have our general life discussions and laughs, and he always offers a pragmatic fresh perspective when I am probably being a little dramatic.

In 2016 my partner and I travelled to central America and stayed with Matt and Shannon, and wee Roman for a week before departing home to New Zealand. Shannon's dad had recently passed away, and we met and spent some time with her family. Matt was nothing but supportive and caring, offering any help where he could to try ease the pain. Matt is a great father to his two young boys, and I saw that first hand with Roman. He is gentle, sensitive, and wants the best for his family and to raise respectful, kind, intelligent men. One memory that still warms my heart is Matt would take Roman to a gelato place one a week in Little Italy for an ice cream, and Roman would be ecstatic – this is a fond memory of his Dad he will have forever, I'm sure.

Matt is someone I would trust with my own life, and over the years I cannot, hand on heart say, that I have met many people in my time that are as loyal, honest, and trustworthy as him.

It is my hope this letter regarding Matt and his case will act as a positive and contributing factor when the court considers this matter.

Yours respectfully,



Kelly Johnson
Manager Professional Business
[REDACTED]

Kevin Earle

[REDACTED]
Christchurch 8011
New Zealand

August 30th 2022

The Honorable Judge Sammartino

San Diego Court

In the matter of the sentencing in the San Diego court of Matthew Isaac Wolfe on a charge of conspiracy to commit sex trafficking.

Judge Sammartino,

My full name is Kevin Lawrence Earle. I am a seventy-five year old married man resident in Christchurch, New Zealand. I am a retired gentleman of no particular standing other than I have managed to remain married to the same patient and forgiving woman for some forty-eight years.

And I am a friend of the man who is to be sentenced in this case, Matthew Isaac Wolfe, for whom I write willingly at his request.

I find it difficult to describe the disbelief and disappointment I felt when I first learned of Matt's offending. I am both saddened and shocked by this whole affair. To say that I am deeply saddened for the victims of Matt's crimes is an understatement, for I can only imagine the trauma that they must continue to suffer.

I am further shocked and disappointed because this court case and the facts surrounding it as I have read in the news are not representative of the Matthew Wolfe I once mentored and worked with.

For a period of some six or perhaps seven years beginning in about 2004, I was Matt's life-coach and a work colleague. As I recall our contact ended like many did, around the time of the devastating Christchurch earthquakes of February 2011.

I am some thirty-five years older than Matt who must have been in his early twenties when we first met. I was working as a Doorman in the hospitality security industry at Christchurch (NZ) Mickey Finns & Rockpool bar. Live-band rock venues that would have several thousand people come through the doors over the course of a weekend. Matthew Wolfe was a Duty Manager there.



In my security role I worked closely with management and I found Matt to be honest and transparent in all of his dealings, important attributes in a largely cash business that Matt was at times solely responsible for. The Matt I knew was a well presented, mature, and level-headed young man of calm demeanor, not given to foul language, anger, or violence.

I never once witnessed Matt anything other than calm and collected. He never spoke ill of others and he treated customers and work colleagues alike with dignity and respect. All valuable characteristics befitting of such a responsible position. In my experience Matt's work ethic was above reproach.

I observed Matt mentoring new and less experienced staff members. Many would be older than Matt but hesitant, sometimes fearful, at their first experience in what can quickly become, as I am sure you can imagine, a hostile, often violent environment.

My specialty is Wing Chun, a Chinese discipline of health, fitness, and self defense, and I have spent much of the past fifty years coaching others in healthy living practices. Matt expressed an interest in my program and I accepted him willingly as I was impressed not only by his professionalism in carrying out his duties and his obvious caring for others, but by his expressed desire for self-improvement and personal growth.

During Matt's training sessions with me he applied himself diligently, and it quickly became apparent that he practiced the various exercises between sessions, and written tasks were always completed. In fact I would describe Matt as the perfect student.

I have learned over the years that my wife Raewyn is a much better judge of character than I am. Never in all our dealings with Matt did my wife or I know or have reason to suspect that he was already engaged in this serious offending. Raewyn liked Matt, he was always courteous and respectful while in our home and neither of us ever held any concerns for either of our two daughters or our grandchildren during his many visits whether to attend his training sessions with me or to fix our technology.

If Matt had one weakness it was his ready willingness to help others. Technologically illiterate, my wife and I struggled with our first computer and our first mobile phones. Matt spent many hours at our home finding lost files, restoring and performing fresh installations on my "broken" computer. He taught me how to develop a web-site for my training and coaching programs. He was always generous with his time.

He showed my wife and I how to operate our mobile phones. I recall on one occasion Raewyn's phone became inoperable and I called Matt. He was at our home within the hour and had her phone operational within minutes. He did so willingly and voluntarily, and on a number of occasions I saw him extend that same helping hand to others.

How did Matt come to this day? I can only speculate, but perhaps it was his ready willingness to help others that slowly drew him in and ensnared him in his criminal offending, for the Matt Wolf I know was an outstanding young man of excellent character and integrity who showed great promise. I am disappointed beyond words.



I cannot possibly ignore or minimize the harm Matt has caused his victims and I understand that he must face the full consequences of his past actions. However moving forward I do believe that if he is ready to accept responsibility for the trauma he has inflicted upon his victims and is willing to accept help in addressing his problems in a proactive manner, then Matthew has, I believe, a great capacity for good and an ability to contribute positively to society when that opportunity arises.

It is my hope that my letter helps you form a compassionate understanding of the man Matthew Isaac Wolfe who will stand before you this day.

Thank you for your time,

Respectfully



Kevin Earle
On behalf of Matthew Isaac Wolfe

Kevin Lawrence Earle

[Redacted]

Christchurch
8011
New Zealand

Mobile [Redacted]

email at ... [Redacted]



J.W. Syme, JP #15075
Ph 021 954 954
CHRISTCHURCH
Justice of the Peace for New Zealand

30/8/2022



Certified true copy of the document presented to me as an original.
Sign: [Handwritten signature]
Phone 021 954 954
Date: 30/8/2022

To whom it may concern,

I have known Matt Wolfe since 2014. Before his arrest, I spent many hours with him alone, in the presence of other adults and watching him with his two small sons. I always admired his calm, low-keyed demeanor while interacting with his two boys. I've enjoyed meals with his family and had many conversations with him. I knew he is a videographer in the adult film industry but I've not heard him talk much about his job.

I've read the indictment against him and am shocked that he is being accused and then convicted of such behavior. The Matt I know would never bully anyone, especially as described in the indictment. In fact, he would be appalled by such a person as described. He is one of the nicest guys I know, even a little on the timid side. I feel he was unfortunately strongly influenced by his childhood friend.

Since his incarceration, I have spent much time with the two young boys (5 & 10) that call him dad. I've been present when he has called and talked with each of them. Listening to their conversation I can tell there is love between them. Both asking Matt when is he coming home is heartbreaking. During Christmas break I noticed Roman (10yo) crying. Asking him what's wrong, he said he misses his dad and wants him to come home. Did I know when he would be let out? I felt inadequate with no answer.

Please consider the effect Matt's incarceration is having on his two boys Roman and Reign when sentencing.

Larry R. Chase

Retired

Former President/CEO Chase-MobileX (Mobile Medical X-ray Company)

[REDACTED]
[REDACTED]
Christchurch 8052

New Zealand

31 August 2022

RE: MATTHEW ISAAC WOLFE

I have been lucky enough to enjoy the friendship of Matt and his family since Matt was born. I spent a lot of time with both Matt and his sister Ella in their formative years. They were very special kids.

Although I have not seen Matt for some time now, I continue to have a close friendship with his mother Jan and during this time I have been very aware of the support and care Matt has shown to his family and in particular his sister Ella during a very difficult time in her life.

He has continued this loving care and support of his American family with whom he has regular contact and who have remained loyal and caring of Matt during these difficult years.

I sincerely hope that these very important characteristics can be considered in his sentencing.

A handwritten signature in blue ink, appearing to read 'L. E. Tillman', written in a cursive style.

Lesley E Tillman

Richard Berridge

[REDACTED]
Christchurch
New Zealand

20th August 2022

Attention: Judge Sammartino

Re: Matthew Isaac Wolfe

Your Honour,

I have known Matt for 35 years. We met when we were 5 years old in our first year at Merrin Primary School in Christchurch, New Zealand. We immediately became best friends and have remained close since then.

As teenagers at Burnside High School, we stayed at each other's houses so often that his family became my family and vice versa. During these years spent with Matt and his family I found the environment loving, supportive, honest, and genuine.

This upbringing shaped Matt into a kind and loyal person who gets along with absolutely anyone from all walks of life. An outing with Matt in Christchurch was always a string of encounters with people who knew Matt. It always felt like he was friends with half of Christchurch - his genuine kindness and social ease made Matt such a social magnet.

Matt and I consider each other as brothers and, despite the physical distance, we have maintained a very close relationship. I am very much looking forward to next spending some time with Matt.

Yours sincerely,



Richard Berridge

Timothy Fine
Christchurch
New Zealand
c/- [REDACTED]

23 August 2022

For the attention of Judge Sammartino

Private and Confidential - Character Reference: Matthew Isaac Wolfe (“Matt”)

I have known Matt since 2000, where we met as colleagues at Adept Secretarial and Training Services, a small family-owned computer training establishment. Matt and I were both employed as Tutors, teaching people how to use computers. Matt was well liked amongst colleagues and the students – building excellent rapport with everyone he interacted with. He had an easy going, friendly and down-to-earth personality which allowed him to connect with everyone he met.

As time progressed, Matt and I became friends, getting to know one another and socialising outside of work. Matt helped me on a number of occasions with anything from getting me through tough times, to IT or computer related issues. Matt was a great person - reliable, honest and trustworthy – just an all-round good friend.

Eventually Matt left Adept and went on to work in several different occupations, and even though we weren't working together day-to-day, we kept in touch, catching up every now and again. Eventually Matt left New Zealand and moved to America in search of more opportunities and where he ended up starting his family with Shannon.

Matt and I kept in touch, albeit infrequently, after he left, but as with most easy friendships the best are the ones where you can pick up where you left off when a long period of time has passed, which is how it is for Matt and I.

I look forward to when I can see Matt again in person and I know his family do too. I hope this goes some small way to assisting Your Honour with your deliberations.

Yours faithfully

Timothy Fine

23 August 2022

ATTENTION: Judge Sammartino

Your Honour

MATHEW ISAAC WOLFE

I have been asked to give a background reference for MATHEW WOLFE as he comes up before the court in October for sentencing. The circumstance of providing this background saddens me, I have been in disbelief as to what has really taken place. I am 81+ years of age and thinking back quite a long time ago when he was part of my working environment, Matt remains a very vivid and happy part of my working memories. I was owner of a successful typing/digital/computer training where we had many government contracts, eg, a large source of our income; it was a frantically busy overload environment where team players were important and I was fortunate to have a "second to none" team, Matt was one of these. We had a large number of students (60 plus) daily attending.

Matt was employed by my company, Adept Secretarial and Training Services Limited in those days, now sold on to a large global enterprise specialising in digital transcriptions, court hearings, etc. Thinking back, Matt came into my organisation on a government funded full-time computer training course, straight from secondary school, I think around the year 2000, at the age of 15+ years; he successfully completed the course, hence I employed him full time as an IT Training Tutor/Typing Assistant; he stood out throughout his training; qualities of attendance, punctuality, reliability, honesty, team player, quick learner, were the key skills sought in an environment known for quality trained students; he was employed by Adept through until about 2006; he was required to sign a declaration of his personal history, eg no criminal background, prior to taking up his role, something demanded by the government funding agency at the time. Matt learned to accurately and quickly touch type and carried out/assisted with typing/dictaphone overload on the secretarial side of the business when required. Matt always gave to me of his best, loyal and hard working. He excelled with computer technology and was always available to help those struggling to learn new technology/computer skills. Matt was well liked/respected by his students, peers, senior staff and clients alike.

I am thinking of him across the miles and hoping he will be home with his family and friends in New Zealand soon.

Should any further information be required please do not hesitate to ring me.

Yours sincerely

Evelyn Barr
Retired Managing Director/Owner of
Adept Secretarial and Training Services
In Christchurch New Zealand



Bobby Lipton

[REDACTED]
San Diego, CA 92130

March 10, 2024

RE: Matt Wolfe, GirlsDoPorn Case

I am writing on behalf of Matthew Isaac Wolfe. As a dedicated family man, Matt's case was quite troubling and unexpected. I have been close friends with Matt over the past 9 years. In this time, Matt has proven to be of terrific character and a very responsible person. Matt has been an outstanding father, a great partner and a person of high moral character.

I have had countless occasions over the years to observe Matt with his family and his children. He's been a loving and dedicated father and partner and all-around great guy.

It is my hope this letter regarding Matt Wolfe will act as a positive and contributing factor when the court considers his sentencing.

Sincerely,

A handwritten signature in black ink that reads "Bobby Lipton". The signature is written in a cursive, flowing style with a large initial "B" and "L".

Bobby Lipton