

**UNITED STATES DISTRICT
COURT FOR THE DISTRICT OF
COLUMBIA**

UNITED STATES OF AMERICA

v.

STEVEN CAPPUCCIO,

Defendant.

Case No. 21-cr-40-8-TNM

MEMORANDUM IN AID OF SENTENCING

I. Personal History and Characteristics

Steven Phillip Cappuccio was born to two service members, his mother serving as a Marine and later transitioning to work as a civil servant for the Department of Defense, and his father serving as a military police officer in the Marine Corps and in the Army. He grew up with a strong connection to the military. However, his parents' marriage ended when he was just a toddler, and he was raised by his mother as a single parent until she remarried. Steven's stepfather was also a retired veteran.

Growing up, Mr. Cappuccio witnessed his parents struggling with alcohol problems, which influenced his perspective on life. As a teenager, seeking stability

and a sense of purpose, he found solace in the Mormon faith and decided to embark on a mission after completing high school. This mission provided him with an opportunity for personal growth, self-reflection, and a chance to make a positive impact on others' lives.

In his early to late twenties Mr. Cappuccio worked in the restaurant industry until he could find what his true calling would be. It was in the late 1990s that he met Jennifer, a fellow employee at the restaurant he worked at. Their connection was instant, and they formed a deep bond. Eventually, Steven and Jennifer welcomed their oldest son, Sebastian, into the world, even though they were not married. *See Exhibit 1 – Sentencing video.*¹

For Steven, Jennifer and Sebastian became the center of his universe. They gave him a sense of purpose and motivated him to work diligently and strive to be a better person. Their love and support inspired him to build a stable, fulfilling life, not only for himself but for his family.

Remembering the challenges, he faced being brought up in a broken home he vowed to not do that to his son and married Jennifer. Jennifer and Steven started a life together. He found strength in his faith, formed meaningful relationships, and discovered a sense of purpose through fatherhood.

¹ The video contains Army stock footage of basic training from 11 Bravo in 2002. The video also contains footage from 11 Bravo in Iraq in 2005 and 2006, when Mr. Cappuccio was in Iraq. The SERE Army footage is from 2008 when Mr. Cappuccio attended SERE training.

Steven worked diligently at the HEB grocery store warehouse providing for his family while Jennifer took college courses. He cherished the simple joys of their everyday life until September 11, 2001. *Id.*

Like many others,² he was deeply affected by the tragic events of 9/11. As the footage of the devastating attacks unfolded on his television screen, Steven found himself glued to the TV, overwhelmed with a mix of emotions: shock, anger, and a profound sense of patriotism. *Id.* As he watched the images of heroism and sacrifice, the stories of first responders and the brave men and women serving in the military, something stirred within Steven. He felt a call to action, a desire to contribute and make a difference in the face of such immense adversity. One day, while working at the warehouse, Steven found himself lost in a sea of patriotic music that played over the loudspeakers. The melodies resonated with him, filling his heart with a sense of duty and purpose. In that moment, he made up his mind, he wanted to join the military and serve his country. *Id.*

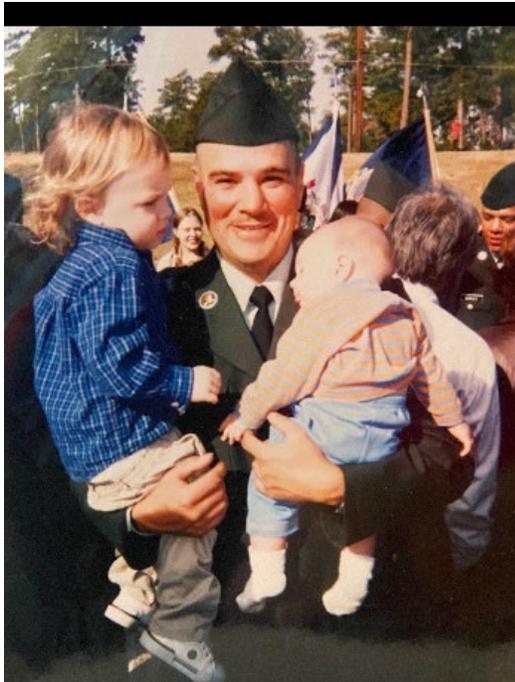
Steven sat with Jennifer that evening, discussing the possibilities and the potential impact on their family, if he joined the military. With love and support, Jennifer understood the depth of Steven's longing to serve, and they made the

² Pat Tillman famously turned down a multimillion-dollar NFL contract with the Arizona Cardinal to enlist in the United States Army in May 2002. NBC News, *Ex-NFL Star Tillman Makes 'Ultimate Sacrifice'*, Apr. 23, 2004, <https://www.nbcnews.com/id/wbna4815441>

decision together. They agreed that his desire to make a difference was something they could not ignore. *Id.*

Steven's Mormon faith played a significant role in shaping his values and his desire to serve. The experiences and lessons he had learned as a missionary when he was 18 had prepared him for the challenges he would face in the military. His faith taught him selflessness, resilience, and the importance of helping others. These teachings would become the guiding principles of his military journey.

Steven enlisted in the army in September 2002 as an infantryman, fully aware that he was embarking on a different path than most recruits. He was older than many of his fellow soldiers, and his life experiences and the values instilled in him through his Mormon faith gave him a unique perspective and a solid foundation on which to build upon. The discipline, adaptability, and teamwork skills he had developed during his missionary service allowed him to quickly adapt to the demands of military life. Additionally, his strong faith provided him with a source of comfort, resilience, and the ability to navigate through the physical and emotional rigors of training. He excelled not only in physical prowess but also in the way he mentored and assisted the younger soldiers, always ready to lend a helping hand. *Id.*



Graduation from basic training at Fort Drumm with Sebastain and Hunter.

A. 11 Bravo - Training and Deployment

As 11 Bravo infantrymen, soldiers undergo rigorous training that emphasizes the importance of quick decision-making and action over contemplation. This training approach is designed to cultivate a mindset where soldiers instinctively react to situations without hesitation, ensuring their own safety and the accomplishment of their mission objectives. The training focuses on developing automatic responses and muscle memory through repetitive drills and simulated combat scenarios. Soldiers are taught to react swiftly and effectively to various stimuli, such as enemy threats, changing battlefield conditions, or the need to provide immediate aid to wounded comrades.

The reason behind this training philosophy lies in the nature of combat itself. In high-pressure and chaotic situations, there is often little time for thorough analysis or extensive deliberation. Split-second decisions can mean the difference between life and death, success and failure. By training soldiers to act without hesitation, the goal is to reduce the risk of indecision or cognitive overload in critical moments.

Additionally, the training emphasizes teamwork, cohesion, and synchronicity among infantrymen. They are taught to communicate and coordinate seamlessly with their fellow soldiers, operating as a cohesive unit that can swiftly adapt and respond to changing circumstances. Through extensive training and shared experiences, soldiers develop a deep trust in their teammates, knowing that they can rely on each other when every second counts.

Furthermore, the training instills mental resilience and the ability to remain calm under extreme pressure. Soldiers are exposed to stressful and challenging situations during training, replicating the intensity of real-world combat scenarios. This exposure helps desensitize them to stress and enables them to maintain focus and composure in high-stakes environments.

The importance of this training cannot be overstated. In combat, where the fog of war obscures clear decision-making, soldiers must be able to act swiftly and decisively to protect themselves, their comrades, and accomplish their mission objectives. By training infantrymen to react instinctively and work as a cohesive

unit, the training helps maximize their chances of success and survival in the heat of battle.

Ultimately, the goal is to create soldiers who are not only physically proficient but also mentally prepared to face the challenges and uncertainties of the battlefield. Through their training, 11 Bravo infantrymen develop the necessary skills, mindset, and reflexes to act effectively in the face of adversity, ensuring they are ready to confront the demands of their role as frontline warriors.

Steven was a good soldier. As he progressed from basic training to specialized training through his military career, he discovered a deep sense of purpose and fulfillment. The opportunity to serve his country and make a positive impact on the lives of others resonated with him on a profound level. He felt a strong connection between his faith, his commitment to service, and his role as a soldier.



Steven's leadership qualities didn't go unnoticed by his superiors, and he was soon recognized as a valuable asset to his unit. His innate ability to bring people

together, to create a sense of camaraderie and teamwork, was a testament to the strength of his character and his unwavering dedication to the well-being of his fellow soldiers. *Id.*

In his three deployments to both Iraq and Afghanistan,³ Steven proved to be



an exceptional leader. He led his unit with courage and compassion, always putting the safety and welfare of his fellow soldiers first. For his meritorious service as a team leader, he was

awarded the Army Commendation Medal for all three of his deployments. *See* Exhibit 3 - DD214.

Through his actions, Steven brought hope and reassurance to those around him. He never hesitated to go the extra mile, whether it was helping a struggling soldier adjust to the realities of war or bringing a sense of home to his comrades through his unwavering support and kindness. *See* Exhibit 1.

³ Steven's first deployment to Afghanistan lasted 9 months (7/11/03-4/14/04). On his second deployment Steven was sent to Iraq where he served 11 months (12/05/05-1/1/06). His last deployment to Afghanistan lasted 10 months (5/12/11-8/10/12) *See* Exhibit 2 – Enlisted record brief.



Steven’s deployments did leave an indelible mark on his mind and soul. During his time in the war zones, Steven witnessed the horrors of combat.⁴ Tragically, he witnessed the death of twelve fellow soldiers, *See Exhibit 4 –*

Medical history notes dated 6.12.14.

On one occasion in the war-torn city of Baghdad, Steven found himself serving as a Bradley commander, dedicated to protecting his comrades and completing his mission. It was a challenging and dangerous environment, where every day brought uncertainty and the constant threat of violence. *See Exhibit 1.* As Steven and his unit were patrolling a volatile neighborhood, tragedy struck. An improvised explosive device (IED) hidden in the road detonated beneath another

⁴ Being a soldier in Iraq and Afghanistan was an immensely challenging and visceral experience. The shared latrine, with its overpowering stench and limited sanitation, “piles of feces, blood and urine on the floor”, was a constant reminder of the harshness of their surroundings. *See Exhibit 11 – Psychotherapy Progress Notes.*

Patrolling through the darkness, heightened their senses and every sound was magnified. The echoes of gunshots reverberated through their body, and the sudden flashes of light had their hearts racing, and adrenaline pumping. *Id.* The sight of children, their innocent faces distorted by the weight of AK-47s, sent shivers down their spine. *Id.* They looked like pint-sized soldiers, a haunting reminder of the blurred lines between innocence and the brutality of war.

Bradley Fighting Vehicle, engulfing it in a searing blaze. The force of the blast sent shockwaves through the air, leaving everyone momentarily stunned. *Id.*

As the acrid smoke cleared, Steven's heart sank. He witnessed the horrific sight of his fellow soldiers, trapped inside the burning vehicle and struggling for their lives. Time slowed down as Steven and his fellow soldiers, overwhelmed by a mixture of shock, fear, and disbelief, stood rooted to the ground.

Their training had prepared them for many scenarios, but nothing could have prepared them for this. The helpless soldiers inside the Bradley screamed and pounded on the armored walls, their desperate cries echoing in the air. Steven and his fellow infantrymen, torn between duty and the gut-wrenching sight before them, fought against their own instincts to rush to their comrades' aid.

But the fire was relentless, its ferocity consuming everything in its path. The soldiers could only watch in anguish as their brothers-in-arms were engulfed by the flames.

As the fire gradually subsided, leaving behind only charred remnants of the once-mighty vehicle, a heavy silence settled over the scene. Steven and his unit stood in mournful reverence; their minds burdened with the weight of loss. They would forever carry the pain of that day, the indelible mark left by the tragedy that tested their resilience and shattered their innocence.

In the aftermath, the soldiers would lean on each other for support, finding solace in their shared experiences and the unbreakable bond forged through adversity. They would honor the memory of their fallen comrades, carrying their legacy forward as a testament to the sacrifice they made.

Though scarred by the traumatic event, Steven and his fellow soldiers would continue their mission.⁵ They would persevere, drawing strength from the memory of their fallen brothers, and find hope amidst the darkness, knowing that their collective resolve could overcome even the most devastating of tragedies.

As Steven returned home from each deployment, he found himself haunted by memories that refused to fade. The atrocities of war had left an imprint on his psyche, which eventually led to the development of Post-Traumatic Stress Disorder (PTSD). Nightmares became a constant companion, vividly replaying the traumatic experiences he had endured. Sleep became elusive, as his mind struggled to find solace in the midst of relentless flashbacks and intrusive thoughts.

Steven's struggle with PTSD got worse after SERE (Survival, Evasion, Resistance, and Escape) training. From the moment he stepped foot in the training facility, he was thrust into a world designed to push him to greater limits than he had

⁵ “The soldier above all others prays for peace, for it is the soldier who must suffer and bear the deepest wounds and scars of war.” General Douglas MacArthur.

previously experienced. SERE training was to prepare him for the worst-case scenarios he might encounter in the field. *Id.*

The physical demands of SERE training were grueling. Steven faced rigorous exercises, endurance tests, and simulated combat situations that pushed his body to



its breaking point. He endured long marches through harsh terrain, carrying heavy packs and navigating through obstacles, all while sleep-

deprived and physically exhausted.

But it was the mental and emotional toll that truly tested Steven's resilience. The training simulated the harsh realities of captivity, where he was subjected to psychological stressors, isolation, and interrogation techniques. He was stripped of his comfort, thrust into unfamiliar and hostile environments, and forced to confront the deepest recesses of his fears. He faced sleep deprivation, sensory deprivation, food and water deprivation, and relentless psychological manipulation. He was pushed to his emotional limits, with his captors exploiting his vulnerabilities and attempting to erode his sense of identity and loyalty.

For this reason, Steven had to dig deep within himself, drawing on his inner strength and resilience to persevere. The training pushed him to confront his fears, teaching him to stay focused, maintain discipline, and never lose hope, even in the face of unimaginable adversity. It ultimately prepared Steven for the realities of his role as an infantryman. It instilled in him the confidence and skills necessary to survive and adapt in the harshest of circumstances.

Jennifer explains it best in the video for the court when she states, after SERE training Steven was “different than the man I married.” *Id.* His three deployments followed by SERE training “opened doors” in his mind that couldn’t be closed. *Id.* The burden of survivor's guilt began to take its toll on him, slowly creeping into every aspect of his life. The once stoic and composed soldier now found himself plagued by anxiety, hypervigilance, and emotional numbness. *See* exhibit 4. Simple tasks became overwhelming, and his relationships suffered as he grappled with the invisible wounds of war. Yet, amidst the darkness, he refused to let go of his commitment to the military and his family.

Despite his personal struggles, Steven continued to serve as an enlisted soldier, determined to find strength even in the face of adversity. In 2011 he was stationed at Fort Richardson, Alaska without his family. *See* Exhibit 5, 6. While at Fort Richardson, Steven recognized the importance of seeking help and reached out to medical professionals who specialized in treating PTSD. *See* Exhibit 5.

On June 23, 2014, Steven reported to Behavioral Health at Fort Richardson:

“Increasing problems with anger, irritability, anxiety, and sleep. ADM joined the Army in 2002 inspired by 9/11 as an infantryman. He has been at several duty stations, to include the last 3-5 yrs in AK. He has been deployed twice to Afghanistan 11/12, 03/04, and once to Iraq 05/06. Pt briefly described several incidents: *long hours, mortars, loss of teammates, suicides, bodies, “carnage,” seeing the children affected, sanitation problems, IEDs, VBIEDs, several close calls. He described having nightmare of being chased, getting shot, and going on missions, periods of “spacing out”; being reminded of combat by certain songs, feeling jumpy with loud noises such as the children banging in the house, having a few aggressive “bad episodes” with the children (ex: spanked when he couldn’t get them to bed). Pt voiced uncertainty if his current problems are deployment related because he feels the things, he was exposed to were part of his job as an Infantryman.*

...Voiced his frustration which resulted 2-year battle to get his family to Ak, plus he was viewed by the Command as a complainer and not mission focused for the deployment, “worst 3 years of my life.”

...Pt does not consume alcohol or tobacco products as part of LDS faith and also feels he’s judged poorly. He admitted feeling “tired of fighting” with the Army and noticed not being himself in the last several years, used to be very social and friendly and is no worried irritable. ADM was uncertain if he’s in need of therapy but was willing to continue discussing symptoms toward diagnosing and treatment plan. He agreed that he could benefit from improving mood and functioning and better managing sleep.”

Id. (emphasis added)

He was later diagnosed with PTSD. *See Exhibit 7.* Later that year he was honorably discharged from the military. *See Exhibit 3.*

B. Civilian Life

Being discharged was a heartbreaking realization for Steven, as he always envisioned a long and fulfilling career in the armed forces. Despite that chapter being closed, Steven and his family returned home to Texas.

Now a civilian, Steven faced a new challenge: finding employment. The transition from a structured military environment to the civilian job market proved to be a daunting task. His PTSD symptoms continued to affect his daily life, making it difficult to maintain regular sleeping patterns and concentrate on job applications. *See Exhibit 8.*

Through therapy and support groups, he gradually learned coping mechanisms to manage his symptoms.⁶ Steven's journey was not without setbacks. Some days, the weight of his experiences threatened to consume him. But his determination to overcome his mental battles kept him going. He found solace in connecting with other veterans who understood the unique challenges of transitioning back to civilian life.

Unable to secure employment, Steven found himself facing a new role as a stay-at-home dad to his five children while his wife worked at HEB grocery store.

⁶ In May 24, 2018, Steven enrolled in a research study titled, "A Study of Moral Injury in Veterans with PTSD" symptoms. *See Exhibit 7 – Enrollment Consent Form.* He also attended and completed a residential treatment program, STARR (Servicemember Transitional Advanced Rehabilitation Recovery). *See Exhibit 11.* Before that, in 2016, he had attended individual therapy sessions and in 2017 had undergone EMDR therapy. *See Exhibit 8; Exhibit 9.*

Embracing this unexpected role, Steven dedicated himself to creating a loving and nurturing environment for his family. *See Exhibit 1.*

Through the STARR program, a specialized initiative for veterans with PTSD, he found a supportive community where he could share his experiences and receive targeted treatment. *See Exhibit 11.* He learned to navigate his PTSD, became an advocate for mental health within his circle of fellow soldiers and shared his story, shedding light on the hidden struggles many soldiers face long after they return from the battlefield. Through his bravery and resilience, he inspired others to seek help and find hope in even the darkest of times. *See Exhibit 1.*

Before the COVID-19 pandemic disrupted daily life, Steven had enrolled in school, aiming to acquire a degree in kinesiology with a minor in history. This decision was driven by his passion for understanding the human body and his love for learning about the past.

However, just as Steven was beginning to make progress in his studies, the pandemic struck, causing classes to shift to remote learning. The sudden change in the educational landscape put a damper on his academic pursuits. The lack of in-person interaction and hands-on learning experiences made it difficult for Steven to fully immerse himself in his coursework. It became challenging to maintain the same level of engagement and motivation he had initially possessed.

Nevertheless, he continued attending therapy sessions and participating in support groups, even virtually. The sense of community he found through these programs and his therapy sessions provided him with the strength and resilience to keep moving forward, even during challenging times.

Despite the obstacles posed by COVID-19, Steven remained focused on his long-term aspirations. He recognized that setbacks were a part of life and was determined to continue his education once circumstances allowed. In the meantime, he embraced his role as Mr. Mom, finding joy and fulfillment in being present for his children and supporting his wife as she worked to provide for the family.

II. The Offense Conduct⁷

Consistent with the character described by his friends, church elders, and family, Steven is a nonviolent man dedicated to service, and this Court declined to convict him of violating 18 U.S.C. §1512(c)(2). *See* Exhibit 1. He did not bring a weapon, helmet, or any tactical gear to the Capitol, nor did he communicate with friends or family about any expectation of violence.

The events of January 6 were highly unusual and not representative of Steven's overall character or behavior. Normally, he actively seeks treatment for his PTSD and avoids situations that could trigger his symptoms, such as crowds and

⁷ This Court as the trier of fact knows well the scope of Mr. Steven's actions on January 6, 2021.

loud noises. This demonstrates his commitment to managing his condition and maintaining a peaceful and non-confrontational approach to life.

Given Steven's history and his conscious efforts to avoid situations that could potentially exacerbate his PTSD, it is reasonable to believe that he will continue to prioritize self-care and make choices that align with his well-being. It's unlikely that he would knowingly again put himself in a situation where he feels uncomfortable or at risk, such as attending events with large crowds or loud noises.

III. Punishment and Deterrence

Prison can be an incredibly challenging environment for veterans with PTSD. Confinement in a prison setting can trigger the trauma experienced during war, leading to heightened anxiety, stress, and flashbacks. The loud noises, lack of personal space, and constant hyper-vigilance inherent in prison life can exacerbate the symptoms of PTSD, making the veteran's condition worse. *See* Exhibit 1, 10 – Dr. Xenakis Report. The similarities between prison and war can be distressing. SERE school impresses on soldiers the perils of captivity at the hands of enemy combatants. The memory of that traumatic training endures. Both environments involve restricted freedom, constant surveillance, and a heightened sense of danger. These similarities can evoke memories of combat situations, leading to increased hypervigilance and a feeling of being trapped, which can intensify the veteran's PTSD symptoms. *Id.*

Moreover, the harsh and unpredictable nature of prison can further exacerbate the veteran's mental health. The loud noises, such as clanging doors, shouting, and confrontations, can trigger anxiety and panic attacks. In addition, the lack of control over one's surroundings and the constant need to be on guard can intensify feelings of vulnerability and helplessness, worsening the veteran's PTSD symptoms.

A prison environment does not provide the necessary support a veteran with PTSD needs to be reintegrated into society after the service of his time. Limited access to mental health services, inadequate training for prison staff on dealing with PTSD, and the general stigma surrounding mental health can all contribute to a lack of appropriate care for veterans in prison. This lack of support can hinder their recovery and potentially lead to a worsening of their condition. It is crucial to prioritize mental health support and provide appropriate care for incarcerated veterans to ensure their well-being and successful reintegration into society.

Mr. Cappuccio' post arrest behavior weights in favor of a lower sentence in this case. Arrested on August 10, 2021, Mr. Cappuccio had been on pretrial supervision for almost two years without a single violation. This prolonged compliance shows his ability and willingness to obey the law and the orders of this Court. Mr. Cappuccio will successfully complete any supervision this Court imposes.

Mr. Cappuccio's journey serves as a reminder that the scars of war extend far beyond the physical realm. The atrocities witnessed and the lives lost can leave a lasting impact on the hearts and minds of those who serve. But by acknowledging their struggles and seeking support, soldiers like Mr. Cappuccio can reclaim their lives and continue to make a difference, both on and off the battlefield. The loss of civil liberties associated with the felony convictions serves as punishment enough, particularly for someone like Mr. Cappuccio who was a commendable soldier. It highlights the irony and severity of the situation, as it effectively undermines the very rights and freedoms he valiantly defended.

IV. Rehabilitation - Camp Hope

It's important to recognize the struggles individuals actively managing PTSD like Steven have and will have in prison. By acknowledging his past behavior and commitment to seeking treatment, this Court has the power to show Steven mercy and help him continue on a positive path of healing and well-being.

An inpatient facility like Camp Hope in Houston would be a more suitable alternative for Steven than incarceration. Such a facility provides a supportive and therapeutic environment specifically designed to address the needs of veterans with PTSD. *See* Exhibit 12 – Camp Hope letter of acceptance.

Here's why it would be beneficial for Steven and the community:

1. **Specialized Treatment:** Unlike incarceration, where mental health services will be limited, Camp Hope offers tailored treatment programs for veterans with PTSD. These programs are designed by mental health professionals who understand the unique challenges faced by veterans. Steven would receive comprehensive care, including therapy, counseling, and medications if necessary, to help him effectively manage his symptoms. (ADD ARTICLE ABOUT BUTNER AND MEDICAL PROBLEMS AT BOP)
2. **Supportive Community:** Camp Hope fosters a sense of camaraderie and understanding among veterans who have experienced similar traumas. Being surrounded by peers who can relate to his experiences can provide a powerful support system for Steven. This shared connection and support can contribute to his healing process and promote a sense of belonging.
3. **Rehabilitation Focus:** In an inpatient facility like Camp Hope, the primary focus is on rehabilitation and helping veterans reintegrate into society as productive members. The treatment programs aim to equip veterans with coping mechanisms, life skills, and strategies to manage their PTSD effectively. By addressing the root causes of their struggles, the facility empowers veterans to rebuild their lives and contribute positively to their communities. It will help Steven with strategies to avoid situations similar to the one faced on January 6th.
4. **Empathy and Respect:** By choosing an inpatient facility, society demonstrates a commitment to supporting and rehabilitating veterans who have sacrificed for our country. It sends a powerful message that we recognize their service and value their well-being. This approach emphasizes rehabilitation over punishment and reinforces the belief that veterans who are struggling with mental health issues deserve compassion, understanding, and an opportunity to heal.
5. **Support for his Family:** By choosing Camp Hope, the Veteran's Administration would consider Steven to be in a halfway house and will not withhold his benefits due to incarceration. His family would have access to

his paycheck for his service to our country and won't have to resort to receiving aid from the government.

Overall, opting for an inpatient facility like Camp Hope not only provides Steven with the necessary tools to manage his PTSD but also shows a commitment to rehabilitation and support for veterans. By investing in his well-being, we foster a healthier community and honor the sacrifices made by those who fought for our country and our freedoms.

V. Conclusion

Defense Counsels recommend that a sentence that is sufficient and not more than necessary is one that avoids additional active incarceration and that restrains Mr. Cappuccio's freedoms of movement and choices in the community. A 24 month sentence at Camp Hope as a condition of his supervised release would send the clear message that any errors on his part can result in a revocation of his supervision and a return to the loss of his freedom and a prospective lengthy sentence of imprisonment.

Respectfully submitted,

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/S/

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CERTIFICATE OF SERVICE

I, Marina-Thais Douenat, Assistant Federal Public Defender for the Western District of Texas, hereby certify that on the 14th day of October 2023 filed the foregoing objections to the PSR and sentencing memorandum with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

/s/ MARINA-THAIS DOUENAT
Assistant Federal Public Defender