

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

UNITED STATES OF AMERICA

v.

JOSHUA DILLON HAYNES

Defendant.

Case No. 21-CR-594 (TSC)

GOVERNMENT’S THIRD SUPPLEMENTAL SENTENCING FILING

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully submits this third supplemental sentencing filing. As noted in the government’s sentencing memorandum, one of the offenses to which the defendant pled guilty was 18 U.S.C. § 1363, which is a crime of violence for purposes of the Mandatory Victim Witness Restitution Act (MVRA). *See* 18 U.S.C. § 3663A (b)(1) (the order of restitution shall require that the defendant pay an amount equal to the value of the property on the date of the damage, loss, or destruction, if replacement of the property is not possible, practical, or adequate). The government received an estimate of damages from one of the victims, ZDF, as reflected in the exhibits filed in the Government’s Supplemental Memorandum (ECF #40) and attached here. The initial exhibits are in German and in Euros, for a total of approximately 21,960, and in U.S. dollars at the current exchange rate represented an amount of approximately \$23,900. *See Exhibits 1A-1C*. The government’s translation of the information submitted in Exhibits 1A-1C is attached as Exhibit 1D. Subsequent to the initial supplemental memorandum, the government received additional information, which is attached as Exhibit 2. With the additional information, the total amount of damages submitted by victim ZDF is approximately \$33,303.28. The memorandum of

interview is attached as Exhibit 3, wherein the ZDF representative noted the reason for the difference between the amounts submitted in January and now. The government has not received any other claims for restitution from other victims related to the damage in the media staging area.

As requested by the Court in the Order dated April 18, 2023 (ECF 46), the government sets forth the claim for damages by Victim ZDF below.

FROM GOVERNMENT FIRST SUPPLEMENTAL SENTENCING FILING

Position Number	ZDF-Identification Number	Name	Type	Purchase Price	In Dollars
1	4062 6717	Receiver for Return Sound	Unite RP	200.00	219.17
2	4062 6638	Transmitter for Return Sound	Unite TP	400.00	438.35
3	4061 5780	LiveU Encoder	LU600	18,500.00	20,273.50
6		Tripod Plate	SHAN TM 700	400.00	438.35
7		Caterpillar Cellphone		60.00	65.75
8		2 Studio Light Stands		120.00 85.00.*	93.15
9		Sony Headphones	MDR 7506	100.00	109.59
10		Various Video and Audio Cables		80.00	87.67
11		Pelican Case	1510	270.00	295.89
12		Remote Control for Camera Lens	ERD-20A-A02	1,650.00	1,808.23
13		Reflector Mount	RH 353	60.00	65.75
14		2 Studio Light Stands		120.00	131.51

*The amount in line 8 was amended in the subsequent correspondence, attached as Exhibit 2.

NEW:

Position Number	ZDF-Identificat ion Number	Name	Type	Purchase Price	In Dollars
	40616210	Spotlight	Sola 6C	1,977.22	2,166.84
	40631823	Tripod Head	Video 18S2	6,487.39	7,109.53
	40520464	Tripod Leg	Speed Lock SF	0	

TOTAL IN US DOLLARS TO VICTIM ZDF: \$33,303.28 (30,389.61 Euros)

Respectfully submitted,

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