

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

**UNITED STATES OF AMERICA,**

**v.**

**ADAM LEJAY JACKSON,**

*Defendant.*

**Case No. 1:22-cr-00230-RC**

**ADAM JACKSON'S MEMORANDUM IN AID OF SENTENCING  
AND ASSESSMENT OF 18 U.S.C. § 3553(a) SENTENCING FACTORS AND  
MOTION FOR VARIANCE**

DEFENDANT ADAM JACKSON, by and through undersigned counsel, respectfully submits this memorandum, support letters, and videos—for his sentencing, which this Honorable Court will decide on March 21, 2024. Adam Jackson has not broken the law or failed to comply with court instructions in the last 1,159 days. He broke no laws during the 517 days preceding his June 7, 2022, arrest. He had no incidents during the 85 days he was detained pretrial. He successfully complied with the Court's release orders during the 557 days between his August 30, 2022, release—and the filing of this memorandum. Adam struggled with drug addiction as a teenager and young adult. His first contact with the criminal justice system was in 1996. He was sentenced to 10 years of probation in 1997, which he completed. Adam freely admits that he struggled with substance abuse during that time and overcame drug addiction after completing an intensive in-patient drug program in 2006 and the "New Choices Program" in 2007. January 6th is a severe and unfortunate aberration in his law-abiding life since that time. Adam Jackson respectfully submits that the memorandum below demonstrates that a downward variant sentence of time served is sufficient, but not greater than necessary, to comply with 18 USC § 3553(a).

## MEMORANDUM

Adam Jackson was not politically active before the COVID-19 Pandemic. Adam was a project manager and businessman, and approximately 15 trucks reported to him. When the Pandemic hit, Adam had to make hard decisions regarding the men who worked for him. Simply put, there was not enough work to go around. As the months passed, Adam's workers began to lose their cars and homes...and Adam felt responsible. The Pandemic was the first time in Adam's post-2007 life that he could not master the elements around him. Feeling out of control, depressed, and isolated, like many other Americans, Adam began to spend more time online. He used social media with increasing regularity to communicate with other people and express himself. Adam believed that the 2020 Election was incorrectly decided. He saw on the news that the President of the United States and many pundits shared that view. He also spoke to many people online who believed the same. Adam learned that throngs of Americans would attend a series of rallies and hear the President speak in Washington, DC, on January 6, 2021. Because of this, Adam traveled to Washington, in good faith, to hear President Trump speak and to protest the results of the November 2020 election—in solidarity with people who shared his views, absent knowledge or suspicion of planned violence or personal intent to be violent in any way.

The plan was for Adam to travel with his brother, Brian Jackson, affectionately known as "Scooter." Adam was surprised when Scooter arrived at the airport with Adam's old roommate, a man named Ryan, whose nickname is "Rhino." Adam had not been on a guy's trip in over ten years. He also had not seen Rhino in over a decade. So, when the three old pals connected, they did what men in their forties often do on guys' trips. They began drinking and behaving like irresponsible 21-year-olds. Adam arrived at the area surrounding the Ellipse at 5:00 AM on January 6. The weather was very cold, and the three geniuses decided to drink to stay warm.

Adam began drinking whiskey shortly after 5:00 AM and continued throughout the entire day. By 10:00 AM, there was an estimated 30,000 people on the Ellipse. President Trump began his speech at approximately noon. Throngs headed to the Capitol's Western Terrace by 12:30 PM. Adam Jackson went to lunch and drinks with his buddies around that time. Ryan Samsel breached the Western Terrace at 12:53 PM. Multiple breaches occurred on the eastern and western sides of the Capitol Grounds by 2:00 PM. The Joint Session recessed at 2:20 PM, and an evacuation ensued. Adam Jackson headed back to his hotel for drinks with his pals. The East Rotunda doors are breached at approximately 2:30 PM. Ashli Babbitt was shot and killed at 2:44 PM. A full-scale riot breaks out on the Western Terrace by 3:00 PM. Adam shows up drunk on the Western Terrace around 4:15 PM. Justin Winchel, referring to Roseanne Boyland, cries out, "She's dead, she's dead!" at 4:26 PM. News of Boyland's death circulates across the Western Terrace by 4:40 PM. At approximately 4:45, Adam Jackson is angered after learning of Ashli Babbitt and Roseann Boyland's deaths. At 4:47 PM, Adam takes a swig of whiskey and throws a soft construction cone at police officers. He is handed a riot shield and decides to charge the police line like a drunken idiot. Adam runs into a line of police officers fully clad in riot gear. Adam falls the moment he makes contact. He then realizes that he is bleeding from his head and makes the journey home.

Adam's conduct, relative to that of the other Capitol rioters, is objectively less problematic than those who planned, coordinated, and executed a premeditated paramilitary attack on the Capitol. Adam's conduct is also less problematic than those who pre-purchased weapons and tactical gear and then attacked police. It is also important to highlight that Adam is not a part of any extremist or hate group. And, of course, Adam Jackson never entered the Capitol Building. Adam Jackson traveled to Washington to exercise his First Amendment right to protest yet ended up wrongfully interacting with the police absent premeditation—an action he regrets deeply.

Adam Jackson respectfully asks that his actions be examined within the full historical context of the events leading up to January 6, 2021, and his conduct contrasted against all other rioters. For Adam, the only difference between January 6th and the BLM protests was the reason for outrage. Adam never imagined that the act of throwing a cone and charging a police line could have ever resulted in him receiving a felony conviction. However, as Adam realized the scope of what happened on January 6<sup>th</sup>, he became profoundly aware of the damage done to law enforcement, the Capitol, and his family. Adam makes no excuses for his conduct. He accepts full responsibility for his actions and throws himself at this Honorable Court's mercy.

Courts have granted downward variances based on a defendant's family circumstances. *United States v. Martin*, 520 F.3d 87, 93 (1st Cir. 2008) (affirming downward variance based in part on “the support that the defendant stood to receive from his family [and] personal qualities indicating his potential for rehabilitation”); *United States v. Muñoz-Nava*, 524 F.3d 1137 (10th Cir. 2008) (record supported finding extraordinary family circumstances; defendant cared for his eight-year-old son as a single parent and had elderly parents with serious medical problems); *United States v. Lehmann*, 513 F.3d 805 (8th Cir. 2008) (per curiam) (affirming downward variance where the court found that a prison sentence would negatively affect the defendant's disabled young son). That is exactly what Adam Jackson asks for here.

When judged on a sliding scale from the most serious offenders to the least, Adam's conduct clearly falls in the category of the least serious offenders. Importantly, Undersigned Counsel has not raised Adam's voluntary intoxication or his reversion to his 21-year-old self as a defense. But rather to contextualize how this material aberration occurred in Adam's law-abiding life. Like many other men in this world, Adam is best when operating within the support structure of his family and worst when his inhibitions are low after a day of binge drinking in public.

January 6<sup>th</sup> was a severe and unfortunate aberration in Adam's law-abiding life. Adam Jackson is a husband, father, grandfather, brother, business owner, mentor, and role model. He runs a successful small business named Patriot Services Electric, which he built from the ground up with his wife, Jamie. Adam is known for caring for his employees and helping many in his community. Adam grew up under modest financial circumstances, just above the poverty line, in a lower middle-class setting. He got into trouble as a teenager and young adult and was sentenced to ten years of probation in 1997, which he completed. Adam freely admits that he struggled with substance abuse as a young man—and points to the fact that he has grown into a respectable member of his community since that time. Adam, therefore, is a prime example of a man who changed his life around completely after a judge chose rehabilitation and court-supervised release over incarceration.

There are 60-character letters in support of Adam Jackson's Sentencing Memorandum. Family members submitted twenty-three letters. Neighbors and friends submitted twenty-seven letters. Professional acquaintances submitted nine letters. And Adam wrote a Letter of Contrition. These letters describe Adam as an extraordinary father extremely devoted to his wife, six children, and two very young children. Adam's family describes him as imperative to their emotional and financial well-being. His parents depend on him entirely for their physical and financial survival. Adam is further described as a man whose values are derived from love and respect for God and family. A selfless, charitable, and kind person who makes everyone feel like family. He is respected and admired as a professional who respects law enforcement. He is a youth mentor who focuses on helping young men seeking to enter the workforce and college. Importantly—regarding January 6, Adam is described as remorseful and accountable for his actions.<sup>1</sup>

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<sup>1</sup> (See EXHIBIT A Support Letters & EXHIBIT B, Family Support Videos, *to be filed under seal*)

Adam Jackson has a stellar history of compliance with court-ordered release conditions.

This is demonstrated by years of law-abiding behavior and the fact that Adam broke no laws during the 1,159 days passed between January 6, 2021, and the day of this writing. Furthermore, in addition to completing ten years of probation as a young man, he successfully complied with this Honorable Court's release orders during the 557 days between his August 30, 2022, release—and the filing of this memorandum. Respectfully, Adam's history of complying with court-ordered release conditions heavily weighs against the need for incarceration in this circumstance.

**Adam Jackson's Family Will Suffer Unmitigable Catastrophic Loss If He Is Incarcerated.**

Adam Jackson was a 50% partner at a business named Power Solutions before his arrest on June 7, 2022. Power Solutions collapsed during the pendency of Adam's 85 days of pretrial incarceration. Adam founded Patriot Services Electric shortly after his release with his wife, Jamie, in response to Power Solutions' failure. Patriot Services Electric is a family-owned and operated business employing eight individuals. Four of those employees are members of Jackson's family, and four are close friends of the Jackson family. Adam's wife, Jamie, works for Patriot Services and in human resources at a collection agency call center. Jamie and Adam have six children and three grandchildren. Two of those children are very young. Joanna is five years old, and Jace is three years old. Two of Adam's daughters, Hana and Alyssa, work for the business. Alyssa has three children who are often present with her while working at Patriot Services. This keeps Alyssa's childcare costs down. Milana is three years old; Addilynn is two, and Percy is eleven months old. Adam Jr. also recently began working for the family business. Adam's father, Jim, also owns a small business focused on electrical services. Jim, however, cannot work outside because of debilitating back pain, and his wife Susie is disabled with Parkinson's disease. Because of this, Adam essentially runs his father's business to keep it from failing. As such, the survival of

Adam's parents depends entirely on Adam. Four adults, five young children, and two disabled seniors—depend completely on Adam Jackson.

Support Letter Excerpt: Jim Jackson, Adam's Father

"I am 73 years old, and my body is broken. My back has given out due to years in the military and years working as a laborer. On top of my struggles, my wife suffers from Parkinson's. We can hardly get around and depend on Adam greatly in our day to day lives. Not only in a physical way, but in a financial one as well, he is the one that keeps my wife and I's small business afloat. I fear what will become of us if Adam is no longer around to give us the assistance that we need to survive." (See Exhibit A)

Support Letter Excerpt: Susie Jackson, Adam's Mother

"With his father being almost crippled with a bad back and myself suffering from Parkinson's disease, he is our biggest support system. He helps our little company by making sure we have enough work and employees to maintain our livelihood month to month, even if that means letting us borrow his employees or getting out there and doing it himself. (See Exhibit A)

"Without Adam, our world would crumble, and that is a very scary thing to anyone, let alone 2 people in their 70's who rely on him so heavily." (See *Id.*)

The Jackson family business will fail if Adam is incarcerated. Adam hoped that his former business partner would have been able to keep Power Solutions profitable after his June 7, 2022, arrest. But that did not happen—Power Solutions failed within weeks of Adam's absence. Patriot Services is entirely dependent upon Adam's presence. Adam is the face of the business. He goes on estimates, closes sales, does installations, and interacts with clients. Without Adam, Patriot Services has zero chance of survival, and the Jackson Family will suffer catastrophic loss.

Support Letter Excerpt: Alyssa Collier, Adam's Eldest Daughter

"When Adam got home [from jail] he took a couple days to spend with everyone and then was back to the grind with trying to get his company running again. Unfortunately, it had gotten to far with his absence and the co-owner fall out and he lost his company. Luckily we were blessed enough to start Patriot Services and hit the ground running to build a name for ourselves. Adam has built this company up and kept it running and if he goes away again I honestly don't know that we will survive just like last time." (See Exhibit A)

Support Letter Excerpt: Hana Collier-Read: Adam's Middle Daughter

"Since being home Adam and my mom have started a new company to replace our one that shut down while he was gone. Our family-owned business is just that. It employs 3 of his 6 kids and is the main source of income for 5 of his 6 kids. I mentioned that our other one shut down. We tried to keep it alive but unfortunately, with Adam being gone we could only do so much. Our company is as successful as it is because of who Adam is. He is the face of Patriot Services...Without him here to continue to run our company, I can promise that we won't survive." (See Exhibit A)

Support Letter Excerpt: Kathi Hennesy, Adam's Mother-in-law

"I am worried about what would happen to our family, especially Jace (3), Jojo (5), and Jamie (his wife), if he is taken away again. This has already changed the dynamics of this family; the children are always in constant fear when they can't find their dad or if he's gone for too long."

"The world is a scary place right now, and the truth is that most two income families are barely able to survive. What is going to happen to our family if he goes away. Not only will 3 households they be losing their main source of income, but the kids will be losing their dad, Jamie will be losing her husband and ultimately, we will be losing the man of our house. Our protector. Please don't take away these kid's father." (See Exhibit A)

This court is undoubtedly aware of the numerous motions filed by undersigned counsel during the pendency of Adam's supervised release, which were related to Adam's family. Most of them were related to Adam Sr.'s relentless support of Adam Jr.'s high school football career—and then his college football career. Undersigned Counsel was shocked and heartbroken when he recently discovered that nineteen-year-old Adam Jr. had, in anticipation of his father's incarceration, given up his college football career and scholarship to come home and attempt to save Patriot Services. Adam, Jr. did this because he understands that his father's incarceration represents financial death for his entire family. Adam Jr.'s attempt to save Patriot Services is honorable. Adam Jr., however, lacks the experience, knowledge, and licensing required to save it.

Support Letter Excerpt: Adam Jackson, Jr.

“He is the center of our family; it is held by him. He is the solid tree, and our family members are the branches. We all hold on to him tight as he has never betrayed us or hurt us. This goes with his community too; My dad started a generator business to help after he noticed many power losses due to hurricanes in our Houston area. He quit his main job to pick up on his little-to-nothing business that he started from scratch. All this to help his community, not realizing how big it would become and not even thinking twice about if it would blow up or not.” (See Exhibit A)



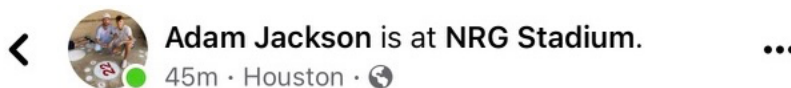
*Jackson Family Christmas Photo*

Support Letter Excerpt: Adam Jackson, Jr.

“It hurts to say it, but I gave up my scholarship and dream of playing college football to step up and be the man of the house for my mom. My little siblings need their dad and if you take him away, I will be forced to be the father figure they need while still being a child myself, because that is the way my dad raised me, and I am not ashamed of it. No matter how much I loved football, being a Jackson means family is the main priority.” (See Exhibit A)

Letter of Contrition, Excerpt: Adam Jackson, Sr.

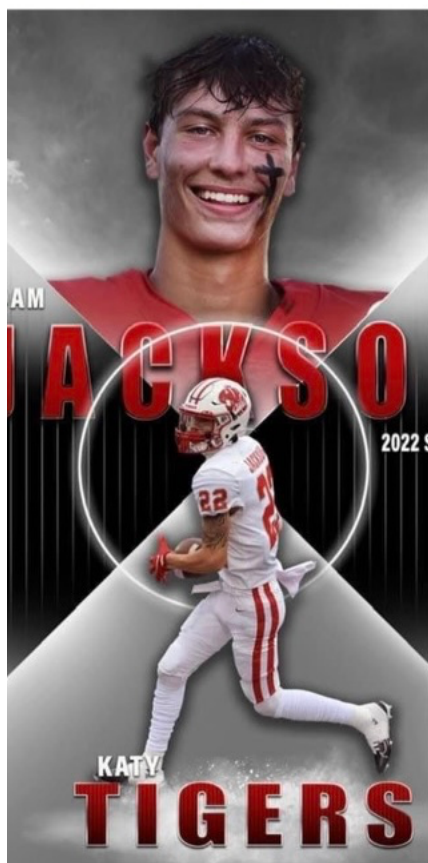
My 19-year-old son is now employed with us and has enrolled in trade school. After one semester and an outstanding college football season, he gave up his dream of playing collegiate football to come home and help his mother with our small children. His mother and I are devastated. Our son has worked so hard, and he is genuinely talented. I am crushed that he may have to assume my fatherly role at 19. (See Exhibit A)



Tonight is a big night! I have been taking [Adam Jackson Jr.](#) to Katy games since he was a little guy. We attended many Katy playoff games at NRG stadium dreaming of him one day playing on this field. To say he earned it is an understatement! Tonight is your night son.

Let's go Tigers!!! 🐾🏈

[Jamie Hennesey Jackson](#)



**Breakdown of Catastrophic Loss That Will Commence Upon Adam Jackson's Incarceration**

Name	Age	Relationship	Occupation	Impact of Adam's Absence
James (Jim) Jackson	73	Father	Owns small family electrical company	-Adam runs entire business, will lose all income. -Crippled with back issues, physically depends on Adam.
Nedra (Susie) Jackson	74	Mother	Owns small family electrical company	-Adam runs entire business, will lose all income -Has Parkinson's Disease, physically depends on Adam.
Jamie Jackson	45	Wife	Co-Owner of Patriot Services & HR rep at Fidelity Call Center/Collection agency	- Patriot Services will fail. - Family will rely on HR income which does not cover their basic cost of living. -She will be alone with 2 young children and working full time.
Alyssa Collier	27	Stepdaughter	Office and Operations manager at Patriot Services	- Will lose her source of income from family business. - Difficulty providing for her 3 children.
Hana Read	25	Stepdaughter	Office and Operations manager at Patriot Services	-Will lose her source of income from family business.
Haley Jackson	24	Daughter	Teacher	-Will have to help Jamie with younger siblings and potentially give up her job.

Adam Jackson Jr.	19	Son	Apprentice technician at Patriot Service	-Gave up his college scholarship and football career to take care of family. -Will lose income while in trade school.
Joanna Jackson	5	Daughter	Young child	-Will lose formative years with her father. - Mother will have difficulty supporting her.
Jace Jackson	3	Son	Young child	- Will lose formative years with his father. - Mother will have difficulty supporting him.
Milana Goshorn	3	Granddaughter	Young child	Dual income household will be reduced to single family. Very hard to get a new job schedule wise with 3 young kids.
Addilynn Goshorn	2	Granddaughter	Young child	<i>Id.</i>
Percy Goshorn	11m	Granddaughter	Young child	<i>Id.</i>

A downward variance is appropriate under *United States v. Martin*, 520 F.3d 87, 93 (1st Cir. 2008), based on the support Adam will receive from his family and his personal qualities, which speak to tremendous potential for rehabilitation. Extraordinary family circumstances were found in the Muñoz-Nava case because the defendant cared for his eight-year-old son as a single parent and had elderly parents with serious medical problems. Similarly, Adam Jackson has eleven people whose financial well-being depends on his ability to operate Patriot Services Electric. Including two young children and two elderly parents. One with Parkinson's and another nearly crippled. *United States v. Muñoz-Nava*, 524 F.3d 1137 (10th Cir. 2008).

In *United States v. Lehmann*, 513 F.3d 805 (8th Cir. 2008) (per curiam), the Eighth Circuit affirmed a downward variance where the court found that a prison sentence would negatively affect the defendant's disabled young son. Adam's son, Adam Jr., has already dropped out of college. Adam also has two young children who depend upon him for financial, emotional, and physical support. Although not disabled, his kids are far too young to care for themselves. Adam's departure also represents Jamie's inability to afford health care despite likely having to find another job. Adam's departure represents a disaster for those who depend on him and cannot care for themselves. The Jackson family's well-being depends entirely on Adam's business ability. Because of this, should Adam be incarcerated, the financial damage that will hit the Jackson household will be an unmitigable disaster.



*The Top Two Pics are Adam & Joanna "JoJo". The Bottom two are Adam with Baby Jace & Adam, Jr.*

Letter of Contrition, Excerpt: Adam Jackson, Sr.

Our business is the majority income for my household and half for my two daughters' families. I also manage my parent's small business. My elderly parents have owned their small business for 25+ years. Their business was hit hard during the Covid shutdowns. My father struggled to recover his business, which nearly went bankrupt. His body will not allow him to get out and do what is necessary to keep the business afloat. My mother has Parkinson's disease and can no longer manage the books, so I also help with that. I am vital to my family in many ways. I'm not sure what will happen if I am sent to prison. I do know that neither company will survive. (See Exhibit A)

### **Adam Jackson's Contribution To His Local Community Weigh In Favor Of a Variance**

Adam Jackson formed Power Solutions after January 6, 2021. Adam did not feel good about what happened at the Capitol and wanted to do something to atone for his involvement. Power Solutions addressed a need in his local community. Namely, helping keep the lights on during severe weather-related power outages in the region surrounding Houston, Texas. Adam successfully ran Power Solutions until the business collapsed after his June 7, 2022, arrest. After his release, Adam formed Patriot Services Electrical, which helps his community and keeps his father's business afloat. Patriot Services is focused on installing electrical equipment and backup generators and is considered a provider of essential services by members of Adam's community.

Support Letter Excerpt: Jeff Harker, Friend of over 20 years.

"Adam and Jamie...run a critical small business in this part of Texas. His business provides power to families and the elderly in times of natural disasters. Which we have more often here than most places in the U.S. Adam is an asset to the community and everyone in our community can attest to that. He is very involved with community activities as his kids are very involved in sports..." (See Exhibit A)

Stephanie Holchack's grandfather was home on hospice care during a terrible heatwave in Texas. The oxygen machine and portable AC, which kept her grandfather comfortable, blew the outlets, and they lost power. Without hesitation, Adam went over and fixed the issue for them free of charge and rushed home in time for curfew.

Support Letter Excerpt: Stephanie Holchak

“I suddenly remembered Adam owned an electrical company, so I had my husband call him. My hope was maybe we could explain to Adam what happened, and he could give us a better idea of what was going on. Adam immediately said, ‘I’m on my way’... About two minutes after he left, his wife Jamie texted me telling me Adam wanted us to know how sorry he was that he had to abruptly leave, he did not want us to think he was being rude, but he had to be home in time for curfew. I told her no apologies were necessary, especially since he dropped everything to come help my family, I was nothing but grateful.”  
(See Exhibit A)

### **Adam’s Contribution To Young Men’s Lives From His Community Favor a Variance**

Adam Jackson remembers what it was like to be an at-risk youth. Because of this, he has devoted significant time to helping young men better themselves. Here are some examples of young men whose lives have been positively affected by Adam Jackson.

Support Letter Excerpt: Broderick Johnson, Friend of Adam Jr.

“I remember when my mom, dad, and I were all going through stuff, and my parents kicked me out of the house. Mr. Jackson was the first person to call me up, have a conversation with me, and take me in. He understood that if I needed anything, if I needed a place to stay, he would always be there for me. I can completely understand that he made one wrong decision, but I can honestly say, as a young African American man, that he is a good human being. There's nothing bad about him; he would honestly give the shirt off his own back to ensure someone is clothed.” (See Exhibit A)

Support Letter Excerpt: Jacob Holcomb, Friend of Adam Jr.

“He has also helped me progress in my lifetime. Adam Jackson Sr is a small business owner of an Electrical company and offered me a job so I could start my career in the electrical field. Without him, I wouldn’t be where I am today. I am beyond blessed that he is able to not only allow me a safe place to work, but to also show me the ropes and teach me new skills every day.” (See Exhibit A)

Support Letter Excerpt: Pedro Gaytan, Adam has mentored him for over ten years.

“The next time I saw Adam was in 2019 where we met at a rally in our neighborhood supporting police officers and backing the badge. The turn out at this event was incredible and I know we were all proud of the amount of people and families from our community that came out to support our men and women in the police force. Especially in a time where morale for officers was low.” (See Exhibit A)

Support Letter Excerpt: Parker Gunter, Adam Jackson has been instrumental in his life.

“I had learned a lot of how to be a family man, a lot about life from him, and was greatly appreciative to have met him and his family. Mr. Jackson’s drive and commitment to being such a good father is admirable to say the least. I learned a great deal watching him with his kids and his wife and have carried the things he had taught me till this day.”

“I am currently a specialist in the United States Army with over 4 years of service. I have been stationed overseas as a paratrooper and I am now currently on the Border mission for the Texas National Guard. I have taken a lot of what I had observed and being a part of the Jackson family and implemented that into my leadership style. He is a leader, a role-model, and a key aspect in several peoples lives.” (See Exhibit A)

### **A Downward Variance Related To Adam Jackson’s Remorsefulness Is Appropriate**

Whether exceptional or not, a defendant’s true remorse is a valid basis for a downward variance. District courts may vary downward based on remorse without regard to whether the acceptance of responsibility adjustment under U.S.S.G. §3E1.1 is applied. E.g., *United States v. Howe*, 543 Fed. 3d 128, 138 (3d Cir. 2008).

Every reasonable person standing before a judge after confessing his guilt will say they are remorseful for their actions. Adam Jackson, however, is distinguishable for several reasons. It took Adam about a month to realize the severity of his actions after returning home. There were a few weeks of processing emotions and thinking things through before he realized the severity of his mistakes. He spoke with and apologized to his family. He apologized to God and resolved to live life better. Adam is a practicing Christian. His faith requires an apology to God and acts of repentance. What Adam did do was become a better husband, father, coach, and man. In August of 2021, Adam founded Power Solutions in response to a growing need in his local community to provide backup electrical services to people who regularly lose power. Adam did his best to move on with life during the sixteen months preceding his arrest. He never returned to Washington, DC. He did not join any extremist groups, nor did he make any threats against the government. Adam did not break any laws. Adam did his best under the circumstances to atone for his mistakes.

Adam's June 7, 2022, arrest came as a shock to his family and community. Adam was humiliated, embarrassed, afraid, and profoundly worried about how his family would survive. Adam founded Patriot Services after his release. He went back to serving his community and providing for his family. Adam has spoken openly and honestly with members of his community about his actions on January 6th and has shown tremendous remorse.

Support Letter Excerpt: Jessica Thomas, Friend

"Adam has shown true remorse for J6 in words and actions. Adam is a selfless and kind human being that is [a] pillar in family and community. Adam is not a threat to his community, he has shown contrition, and he is not a criminal." (See Exhibit A)

Support Letter Excerpt: Toby Hill, Friend & Neighbor

"I can see in him a changed nature of regret. As he speaks of the situation, I can hear his acceptance of being held accountable. "

"I understand that justice must be administered fairly for his actions. I ask of you please consider his value to our community. I can attest that he is a mentor to not just my son, but to many other young men departing high school to entering the workforce or college. To remove him from such would not be advantageous for our community." (See Exhibit A)

Support Letter Excerpt: Adam Jackson, Sr.

I recognize that my actions on January 6, 2021, have hurt many people. I participated in the assault of police officers, the very people that I have taught my children to respect more than anyone. The people who put their lives on the line to protect our loved ones. I am extremely remorseful for the pain and suffering I inflicted on the officers and their families. I have also hurt the people that I love the most. I let down my family, my friends, and my community. I can't undo the hurt that I've caused, but I will spend the rest of my life rebuilding the trust of my family and community. (See Exhibit A)

Adam made a bad drunk decision. When Adam realized the scope of what happened on January 6th and his role in the damage done to law enforcement and the Capitol, he decided to plead guilty. Adam makes no excuses for his conduct. He accepts full responsibility for his actions. He is asking, however, for Your Honor to consider the man who stands before this Honorable Court on the day of sentencing. A man who pleaded guilty admitted wrongdoing and will have 1,171 days

of good behavior/repentant living on the day of sentencing. As explained above, Adam deeply regrets his conduct on January 6th. To the extent his actions contributed to the distress of members of Congress, their staff, or outnumbered law enforcement officers, he offers them his sincere apology. Adam would seize an opportunity to aid injured officers and contribute to repairing physical damage to the Capitol. He will personally demonstrate remorse at sentencing in his allocution.

Further incarceration is not necessary to deter Adam Jackson or the public. The National Institute of Justice, Department of Justice, found that “prison sentences are unlikely to deter future crime,” and “increasing the severity of punishment does little to deter crime.” U.S. Dep’t of Justice, Office of Justice Programs, Nat’l Inst. Of Justice, Five Things to Know About Deterrence (July 2014) (relying on Daniel S. Nagin, Deterrence in the Twenty-First Century, 42 Crime & Justice in America 199 (2013)). Further, “increases in severity of punishments do not yield significant (if any) marginal deterrent effects.” Michael Tonry, Purposes and Functions of Sentencing, 34 Crime & Just. 1, 28 (2006).”

Adam Jackson is a constant source of positivity to those around him. Society is better when he is present in the world. Adam’s proven ability to live a productive life despite difficult circumstances is admirable. As is the love and support he has from all those around him. Adam is eager to remain with and continue supporting his wife, six children, three grandchildren, and two elderly parents. Adam desires to continue to own, operate, and expand Patriot Services Electric. Adam knows full well that incarceration, for any period, will result in financial ruin for his entire family. He also wants to see his non-family employees retain their jobs. Adam’s responsibility to provide for his family and the devastation that will occur in his absence is a significantly greater deterrence than incarceration.

Support Letter Excerpt: Adam Jackson, Sr.

My actions on that day do not reflect who I truly am. I did not go to DC for a riot. I went there to support the president of the United States of America. I let my emotions and alcohol cloud my judgment. I made horrible decisions that day. I am man enough to take responsibility for it. I have taught my children that our actions always have consequences. I will stand before your honorable court on March 21, 2021, ready to accept my punishment. I pray that you will consider that I am truly remorseful and that this unfortunate isolated incident does not reflect who I am. (See Exhibit A)

The maximum sentence for Adam Jackson's §111(a)(1) conviction is eight years. As argued above, when compared to the cohort of January 6th rioters who have been sentenced for assaultive conduct, Adam Jackson's actions are on the low side of the sliding scale. The following defendants objectively committed assaults more egregious than Adam Jackson's yet received sentences for less than one year of assaultive conduct:

- Mark Jefferson Leffingwell, 21-cr-005-ABJ. The Defendant pled guilty to (§ 111(a)(1)) for assaulting two officers inside the Capitol. The Court sentenced him to 6 months incarceration.
- Matthew Council, 21-207-TNM. The Defendant pled guilty to (§ 111(a)(1)) for assaulting an officer inside the Capitol. The government asked for 30 months of imprisonment. The Court sentenced Mr. Council to 6 months of home detention.
- Grayson Sherrill, 21-cr-282-TSC. The Defendant pled guilty to (§ 111(a)(1)) for assaulting an officer with a metal pole that he later took inside the Capitol. The government asked for 41 months, and the Court sentenced Mr. Sherrill to 7 months incarceration.
- David Alan Blair, 21-cr-186-CRC. The Defendant pled guilty to Civil Disorder (18 U.S.C. § 231(a)(3)). He struck an officer in the chest with a lacrosse stick adorned with/ a Confederate battle flag and was sentenced to 5 months in prison.

## CONCLUSION

Adam Jackson respectfully submits that he has demonstrated that a downward variant sentence of time served is sufficient, but not greater than necessary, to comply with 18 USC § 3553(a). A sentence of time served reflects eighteen months of supervised release that have already been completed and nearly 90 days of incarceration, which reflects the seriousness of the offense and promotes respect for the law. Such a sentence is appropriate when balancing the nature and circumstances of the offense against Adam's history, characteristics, acceptance, responsibility, unwavering remorse, and the fact that January 6<sup>th</sup> was truly an aberration in his law-abiding life.



*Adam Jackson, Sr. & Jamie Jackson with their son Adam Jackson, Jr.*

Dated: Brooklyn, NY  
March 8, 2024

Respectfully submitted,

**/s/ Joseph D. McBride, Esq.**

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was electronically served on opposing counsel on  
March 8, 2024

**/s/ Joseph D. McBride, Esq.**