

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	<b>Case No. 23-cr-283 (JMC)</b>
<b>v.</b>	:	
	:	<b>FILED UNDER SEAL</b>
<b>ULISES WILKINSON,</b>	:	
	:	
<b>Defendant.</b>	:	

**GOVERNMENT’S SUPPLEMENTAL SENTENCING MEMORANDUM**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully submits this Supplemental Sentencing Memorandum, filed under seal, in connection with the above-captioned matter.

**I. Introduction**

Ulises Wilkinson (“Wilkinson”) has pleaded guilty to two petty offense misdemeanors, in violation of 40 U.S.C. § 5104(e)(2)(D) (disorderly or disruptive conduct on the grounds or in the buildings of the United States Capitol) (Count Four) and in violation of 40 U.S.C. § 5104(e)(2)(G), (parading, demonstrating, or picketing in any Capitol building) (Count Five). The government has filed a sentencing memorandum. (ECF 35). The government now files this supplemental memorandum to address matters in the Presentence Investigation Report, ECF 29, regarding the defendant’s personal information that should not be disclosed to the public. After consultation with, and at the request of, defendant’s counsel, the government’s attorney has requested to file this supplemental sentencing memorandum under seal.

**A. Wilkinson’s History and Characteristics**

The Presentence Investigation Report, ECF 29, includes statements from Ulises Wilkinson. In the Presentence Investigation Report, the defendant reported “no history of physical or sexual abuse, but he noted that his parents have struggled with his sexual orientation, which has caused

disagreements between them, and the defendant being subjected to verbal abuse.” ECF 29, ¶ 41. The defendant reported that he attempted to commit suicide in 2014, because of how his parents’ views impacted him. Further, the defendant reported a second suicide attempt in 2018, in Seattle, Washington. ECF 29, ¶ 46.

The government appreciates the circumstances of this past trauma but has not verified this information. According to the Presentence Investigation Report, Wilkinson provided limited information to probation, and he has not entered into any counseling or other mental health treatment. ECF 29, ¶ 46. Nor, respectfully, does this information change the nature of Wilkinson’s criminal conduct.

For the reasons stated in the government’s sentencing memorandum, ECF 35, the government respectfully recommends that this Court sentence Defendant to sentence of sixty days’ incarceration on Count Four, thirty-six months’ probation on Count Five, 60 hours of community service and \$500 in restitution in this case. Such a sentence protects the community, promotes respect for the law, and deters future crime by imposing restrictions on Wilkinson’s liberty as a consequence of his behavior, while recognizing his acceptance of responsibility for his crime.

Respectfully submitted,

MATTHEW M. GRAVES  
United States Attorney  
D.C. Bar No. 481052

By: /s/ Lynnett M. Wagner  
Lynnett M. Wagner  
Assistant United States Attorney  
Nebraska Bar No. 21606  
United States Attorney’s Office  
District of Columbia  
601 D Street, N.W.  
Washington, DC 20530  
Phone: (402) 661-3700  
[Lynnett.m.wagner@usdoj.gov](mailto:Lynnett.m.wagner@usdoj.gov)