

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	
)	Cause No. 1:22-CR-124-MPB-MJD
ARNOLD CASTILLO,)	
)	
Defendant.)	

GOVERNMENT’S SENTENCING MEMORANDUM

The United States of America, by counsel, Zachary A. Myers, United States Attorney for the Southern District of Indiana, and, Tiffany J. Preston, Assistant United States Attorney (“the Government”), hereby submits the following Sentencing Memorandum in support of a within guideline sentence of imprisonment followed by a Lifetime of supervised release in the above-captioned matter.

I. Introduction

No parent should wake up to find their fifteen-year old child is missing. No parent should have to spend eight days not knowing if their child is alive or dead. No parent should later learn that a stranger used social media to lure that child away from the safety of their home. No parent should have to be told that the same stranger then spent nearly eight days having sex with their child on the floor of a tiny, dank room nearly 700 miles away. And, no parent should have to receive a call that when their child was finally recovered by law enforcement, that she refused a Sexual Assault Evidence Kit because she has been programmed to believe that she was in love with the person responsible for these crimes. But, that is exactly what Minor Victim 1’s family

has endured at the hands of Arnold Castillo. He is not only responsible for their immense pain, but also for what he did to a fifteen year old child who is still recovering from being betrayed and exploited by someone she trusted.

As set forth in more detail below, Mr. Castillo used Instagram, Roblox, and Discord to meet Minor Victim 1 online and groom her. For months, Mr. Castillo convinced Minor Victim 1 that they were in love. He bought her anime art online, he told her she was beautiful, and he made her believe that her mother and family were her enemy, and he was her savior. He did this knowing Minor Victim 1's age and her vulnerability. He did this knowing that Minor Victim 1 had a family who loved her.

Having spent months using social media to drive a wedge between Minor Victim 1 and her family, Mr. Castillo then hired a Uber driver on or about May 3, 2022, to pick up Minor Victim 1 from her home in Indianapolis, and transport her more than 700 miles away to Paterson, New Jersey. Once there, Mr. Castillo engaged in sexual intercourse with Minor Victim 1 in a tiny room with a dirty mattress on the floor.

For days, Mr. Castillo kept Minor Victim 1 in New Jersey and continued to have sex with her knowing full well that her mother and law enforcement were desperately searching for her. In a stone cold recorded phone interview on May 5, 2022, Mr. Castillo lied to law enforcement officers who were trying to find Minor Victim 1, and told them that he had no idea where she was and that she must have run away. It wasn't until May 11, 2022, nearly eight days after Mr. Castillo arranged to transport Minor Victim 1 from her home in Indianapolis, that agents of the Federal Bureau of Investigation recovered her walking down the street with Mr. Castillo in front of his home in New Jersey. He had condoms in his pocket.

This crime is every parent's nightmare. A within guideline sentence and a Lifetime of supervised release is sufficient, but not greater than necessary, to reflect the seriousness of the offense, promote respect for the law, provide just punishment for the offense, protect the community from Mr. Castillo, and to afford adequate deterrence to criminal conduct.

II. Procedural Background

On May 12, 2022, Mr. Castillo was charged in a two-count Criminal Complaint with Transporting a Minor with Intent to Engage in Criminal Sexual Activity, in violation of 18 U.S.C. § 2423(a), and Coercion and Enticement of a Minor, in violation of 18 U.S.C. § 2422(b). Mr. Castillo was arrested in New Jersey, and removed to the Southern District of Indiana. The Grand Jury later charged him in a two-count Indictment with the same offenses. On May 23, 2023, the parties filed a Petition to Enter a Plea of Guilty. Mr. Castillo is scheduled to change his plea and be sentenced on August 23, 2023, at 1:00 p.m.

III. The Presentence Investigation Report

The Final Presentence Investigation Report ("PSR") correctly concluded that Mr. Castillo's offense level is 35, and he has a criminal history category of I. (Dkt. 52). Accordingly, Mr. Castillo's sentencing guidelines range is 168 to 210 months' imprisonment.

For Count 1, the minimum term of imprisonment is 10 years, and the maximum term is life. 18 U.S.C. § 2423(a). For Count 2, the minimum term of imprisonment is 10 years, and the maximum term is life. 18 U.S.C. § 2422(b). The Court shall impose a term of supervised release of five years to life, on each count to run concurrently. 18 U.S.C. § 3583(k). The parties have no objections to the PSR or the Sentencing Guideline Calculations.¹

¹ As noted by the PSR, the plea agreement contemplated a two-point increase because Minor Victim 1 was in Mr. Castillo's care, custody, and control. As discussed in paragraph 7 of the PSR, the United States agrees with the Officer's assessment regarding the enhancement. However, the fact that Mr. Castillo had complete control over Minor Victim 1 is an aggravating factor under 3553(a). Mr. Castillo kept Minor Victim 1 in a small room located

IV. Title 18, United States Code, Section 3553(a) Factors

A. The Nature and Circumstances of the Offense

Mr. Castillo Uses Social Media and Gaming to Groom Minor Victim 1 and Lure her to New Jersey for the Purpose of Engaging in Sexual Intercourse

As set forth above, Arnold Castillo was a resident of Paterson, New Jersey. Minor Victim 1 was a resident of Marion County, who was born in 2006. Mr. Castillo knew that Minor Victim 1 was fifteen years' old at the time he committed the offenses of conviction. He also knew that Minor Victim 1 was a vulnerable victim, and used the information he knew about her mental state to facilitate the commission of this offense.²

Beginning in at least January 2022, and continuing until on or about May 11, 2022, Mr. Castillo communicated with Minor Victim 1 via social media and gaming applications such as Instagram, Roblox, and Discord. During their conversations, Mr. Castillo knew that Minor Victim 1 was fifteen and in a fragile mental state. Nevertheless, he engaged in grooming behaviors, such as buying Minor Victim 1's anime that she had posted online using CashApp, and buying other items on Amazon which he delivered to her in Indiana. Importantly, Mr. Castillo knew that Minor Victim 1's mother cared about her safety. Indeed, Minor Victim 1 told Mr. Castillo that if he wanted to buy her art online, that she had to get permission from her mother to conduct the transaction.

Mr. Castillo lied about this identity to facility these offenses. He claimed his name was "Jacob Shedletsky" and "Jadon Shedletsky," and intentionally led Minor Victim 1 and others online to believe that he had the ability to connect them to employment opportunities in the online

adjacent to his residence, and controlled her movements in and out of the room. Mr. Castillo also controlled her access to food and basic necessities, and knew that Minor Victim 1 had no financial resources and no ability to travel back to Indiana. Had the enhancement been applied, the Sentencing Guideline range would have been 210-262 months' imprisonment.

² The United States provided additional information regarding her mental state in paragraph 22 of the PSR.

gaming industry. Mr. Castillo's use of an alias during the commission of these offenses and during a call with law enforcement significantly delayed her recovery. His claims about his access to the online gaming industry on YouTube and social media drove many other individuals believed to be children to communicate with him in the hopes they would be selected to be game developers. Indeed, the Federal Bureau of Investigation ("FBI") discovered during this investigation that Mr. Castillo used various aliases on Discord and YouTube. On one such YouTube account, Mr. Castillo described himself as follows:

"Hello there I'm Jadon, I'm 28 years old. I'm a Game Developer, Industry Visionary, and a bit braggadocios. Working on several projects and setting an opportunity for people who don't have the paper but have the skill and experience to be game developers. Want to contact me? Add me on Discord".

After Mr. Castillo met Minor Victim 1 online, he used Instagram and Discord to communicate with her. After some time, those conversation turned sexually explicit. For example, between on or about February 10, 2022, and February 18, 2022, Mr. Castillo discussed showering with Minor Victim 1, and that he wanted to "make love to [Minor Victim 1] and have kids" with her. On or about March 14, 2022, Minor Victim 1 asked Mr. Castillo what it will sound like when they have sex, and Mr. Castillo said he "grunts" and that she will find out soon. Later in March, Mr. Castillo then discussed "fingering" Minor Victim 1's vagina and wanting to "explore" her body. Mr. Castillo also discussed oral sex, and referred to Minor Victim 1's vagina as his "kitty." On or about March 24, 2022, Minor Victim 1 told Mr. Castillo that she did not know how to have sex, and Mr. Castillo responded that it was "instinctual." Mr. Castillo told Minor Victim 1 that they could experiment if she wanted to, but that he would "lead since [he] had the experience."

Mr. Castillo continued to groom Minor Victim 1 by purchasing food and items for her, and shipping them to Indianapolis. For example, between April 7, 2022, and April 12, 2022, Mr. Castillo purchased and attempted to have Amazon deliver a Huion Artist Glove for Drawing

Tablet, a Max Smart Tablet Drawing Stand, and a Wacom Mobile Studio Pro 13 Windows 10 computer to Minor Victim 1 at her residence.

On or about April 13, 2022, Mr. Castillo told Minor Victim 1 that “Sex is a beautiful thing.” On April 17, 2022, the two discussed having sex. During this conversation, Mr. Castillo discussed Minor Victim 1’s “hymen,” stating “Now I just need to make you a woman in the bedroom.” Mr. Castillo messaged, “I love you [Minor Victim 1].” “I made a vow to you that in sickness and in health I would always be with you.”

On or about April 25, 2022, Minor Victim 1 stated that she wanted to run away from home. Mr. Castillo replied, “I did all the setup already,” and, “I want to see you really badly, the only way this is going to work is if you listen to me.” He added, “You want to get away from that shit hole right?” On or about April 27, 2022, Minor Victim 1 told Mr. Castillo that she might be too young for intimacy with Mr. Castillo. Mr. Castillo responded, “you’re not,” and added that they could “take as long as [Minor Victim 1] needs.” Mr. Castillo told Minor Victim 1, “I want to come for you,” and Minor Victim 1 asked Mr. Castillo to “deflower” her. Mr. Castillo responded, “I will sweetheart.”

During these conversations, Mr. Castillo and Minor Victim 1 discussed their plans for Mr. Castillo to arrange for Minor Victim 1 to travel from Indiana to New Jersey so that they could be together and engage in sexual activity. On or about May 2, 2022, Mr. Castillo told Minor Victim 1 that he looked forward to seeing her “tomorrow” and asked her if she “cleaned [her vagina] well.” Mr. Castillo told Minor Victim 1 that he intended to “[mess] with” her vagina, and turn it “into an open rose bud just waiting for [him] to deflower it.”

Sometime between April and May 2022, Mr. Castillo used the Uber application to contact drivers in an attempt to hire a driver to transport Minor Victim 1 from Indiana to New Jersey. Mr.

Castillo located a willing driver, and communicated with the driver on the Uber application, and then off the platform and via direct messaging. Mr. Castillo arranged to pay the driver to pick up Minor Victim 1 from her residence in Marion County, Indiana, and drive her to Paterson, New Jersey.

On or about May 2, 2022, Minor Victim 1 posted on her Instagram page, “Goodbye Indiana.” At Mr. Castillo’s direction, she left her home without telling anyone where she was going or who she was with which left her family believing that she might have been missing, kidnapped, or worse. Minor Victim 1 got into the car with just a few belongings, and between on or about May 3, 2022, and May 4, 2022, the driver transported Minor Victim 1 from her home in Indiana, to Mr. Castillo in Paterson, New Jersey. Mr. Castillo then paid the driver for transporting Minor Victim 1.

Accordingly, between on or about May 3, 2022, and May 4, 2022, Mr. Castillo knowingly transported Minor Victim 1 from Indiana to New Jersey for the purpose of engaging in in any sexual activity for which any person can be charged with a criminal offense, specifically, Sexual Misconduct with a Minor under Indiana law (IC 35-42-4-9 (a) and (1)), and Aggravated Sexual Assault of a Minor under the Age of 16 under New Jersey law (NJ Rev. Stat Sec. 2C:14-2). Mr. Castillo knew that Minor Victim 1’s parent was unaware that he was transporting Minor Victim 1, and would not have consented to same. Mr. Castillo used Instagram, Discord, text messaging, Uber, and CashApp to facilitate Minor Victim 1’s transportation across state lines for the purpose of engaging in criminal sexual activity.

Mr. Castillo Engages in Sexual Intercourse with Minor Victim 1

Upon Minor Victim 1’s arrival to Mr. Castillo’s residence in Paterson, New Jersey, Mr. Castillo engaged in sexual intercourse, including vaginal and oral sex with Minor Victim 1. He

used the Uber application to have others purchase or attempt to purchase the “Plan B” pill for Minor Victim 1 to prevent her from becoming pregnant. Mr. Castillo kept Minor Victim 1 in a small room located adjacent to his residence, and controlled her movements in and out of the room. Mr. Castillo also controlled her access to food and basic necessities, and knew that Minor Victim 1 had no financial resources and no ability to travel back to Indiana. For approximately eight days, Mr. Castillo engaged in sexual intercourse with a fifteen year old on a twin mattress set on the floor of a small, dank room knowing her family was searching for her.

Accordingly, Mr. Castillo used a facility or means of interstate or foreign commerce to knowingly persuade, induce, entice, and coerce, and attempt to knowingly persuade, induce, entice, and coerce, Minor Victim 1, an individual who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense, including but not limited to vaginal intercourse with a child who was fifteen years’ old.

Mr. Castillo Obstructs Justice Knowing that Minor Victim 1’s Family and Law Enforcement were Trying to Locate Her

Meanwhile, Minor Victim 1’s family had reported her missing to local law enforcement. They told law enforcement officers that Minor Victim 1 had last been seen in the early morning hours of May 3, 2022. Officers began an investigation and quickly discovered that Minor Victim 1’s cellular phone wasn’t receiving calls. Cell phone data revealed that her phone had last used a cellular tower in Pennsylvania.

Through interviews with her family, officers learned that Minor Victim 1 had received deliveries via Amazon from someone named “Jacob Shedlesky.” and that someone named “Jacob” had used CashApp to purchase her online anime. Officers also learned that shortly after Minor Victim 1’s family discovered she was missing, her mother reached out to the person who had identified himself as “Jacob” in an effort to find her using the phone number connected to the Cash

App and Amazon deliveries. “Jacob” was Mr. Castillo. During those conversations, Mr. Castillo lied to Minor Victim 1’s mother and told her that he had no idea where she was (even though she was already with him in New Jersey). He messaged her saying, “I wish you good luck in finding her.”

Officers sought a search warrant for Minor Victim 1’s social media account. They also cross-referenced a March 21, 2022, 911 call from a person identifying himself as “Jacob” asking for a welfare check on Minor Victim 1. During that call, the caller (Mr. Castillo) told 911 dispatch officers that he had been speaking to Minor Victim 1 and believed she was suicidal.

Combining the information they learned from Minor Victim 1’s family and the 911 call, officers reached out to the individual calling himself “Jacob” using the phone number from the 911 call and the art purchase. That person was Arnold Castillo. Importantly, that call took place on May 5, 2022—days after Mr. Castillo had paid a driver to take Minor Victim 1 to New Jersey. During the May 5, 2022 call, Mr. Castillo lied to law enforcement about Minor Victim 1’s whereabouts. Namely, on or about May 5, 2022, and while Minor Victim 1 was with Mr. Castillo in New Jersey, Mr. Castillo, using an alias, falsely stated to law enforcement officers that he was from California. When asked about Minor Victim 1’s whereabouts, Mr. Castillo intentionally lied to law enforcement, and stated that she must have run away due to issues with family or from “other people bothering her.” Mr. Castillo also falsely told law enforcement that he suspected that Minor Victim 1 “may have run away on a whim” due to her “emotional outbursts.” He acknowledged sending Minor Victim 1 items through the mail using Amazon, and forwarded detectives copies of the transactions. But when asked why his billing address was in New Jersey, Mr. Castillo falsely responded that the person who conducts his transactions for him was an associate who lived there.

In other words, Mr. Castillo intentionally obstructed justice and failed to disclose to officers that Minor Victim 1 had not runaway, but in fact, that Mr. Castillo had Minor Victim 1 transported to New Jersey, and that she was in his care, custody and control so that he could engage in criminal sexual acts with her. Put another way, between May 5, 2022, and May 11, 2022 (when she was recovered) Mr. Castillo brazenly continued to hold Minor Victim 1 in New Jersey and have sex with her even though he knew law enforcement was working in earnest to find her.

Over the next several days officers interviewed Minor Victim 1's friends and sought authority to search social media and Amazon records. The FBI and the United States Attorney's Office offered assistance, and on May 11, 2022, they received data from Minor Victim 1's social media account. The FBI was able to trace logins from her account to an Internet Protocol address on Coral Street in Paterson, New Jersey. The address was the same location as the previously identified billing address for the Amazon purchases made by "Jacob Shedletsky." Agents also reviewed the messages between Minor Victim 1 and one of Mr. Castillo's accounts and noted that the account maintained a listed username of "Jadon Shedletsky." Indianapolis field agents asked FBI agents in Paterson, New Jersey for their immediate assistance.

Shortly thereafter, and on or about May 11, 2022, at least eight days after Minor Victim 1 was reported missing by her mother, and seven days after she arrived in New Jersey, federal agents recovered Minor Victim 1 from Mr. Castillo as they were walking in front of his residence in on Coral Street in Paterson, New Jersey. Mr. Castillo possessed several unopened condoms in his pocket.

Mr. Castillo, having been read and advised of his rights and acknowledging them orally and in writing in an audio and video recorded interview, confessed that he used private messenger applications to chat with Minor Victim 1 about conducting sexual acts together knowing that she

was fifteen years' old. Mr. Castillo further admitted to using online applications to plan their shared intention for her to travel from Indiana to New Jersey in order to be with him romantically. Mr. Castillo admitted to using CashApp to pay an Uber driver to pick up Minor Victim 1 from Indianapolis and bring her to Paterson, New Jersey on or about May 3, 2022. Mr. Castillo explained that he found a driver willing to make this trip and paid the driver \$500 prior to his departure from New Jersey. Upon the driver's arrival with Minor Victim 1 in the early morning hours of May 4, 2022, Mr. Castillo paid the driver an additional \$500 in cash for the ride. Following this, Mr. Castillo admitting to having vaginal intercourse with Minor Victim 1 four times over the course of the week that followed.

Mr. Castillo used false identities to communicate with Minor Victim 1 and law enforcement such as the names "Jacob Shedletsy" and "Jadon Shedletsy." Mr. Castillo knew that Minor Victim 1 was an unusually vulnerable victim because she told Mr. Castillo things that made that clear.

Accordingly, between on or about January 2022, and on or about May 11, 2022, within the Southern District of Indiana and elsewhere, the defendant, ARNOLD Mr. Castillo, (a/k/a "Jacob Shedletsy" a/k/a "Jadon Shedletsy"), knowingly had Minor Victim 1, an individual who had not attached the age of 18 years, transported in interstate commerce from Indiana to New Jersey with the intent that Minor Victim 1 engage in any sexual activity for which any person can be charged with a criminal offense, and aided and abetted others in so doing, in violation of Title 18, United States Code, Sections 2423(a) and (e) and 2.

Additionally, between on or about January 2022, and on or about May 11, 2022, within the Southern District of Indiana and elsewhere, the defendant, ARNOLD Mr. Castillo, (a/k/a "Jacob Shedletsy" a/k/a "Jadon Shedletsy"), did use a facility or means of interstate or foreign

commerce to knowingly persuade, induce, entice, and coerce, and attempt to knowingly persuade, induce, entice, and coerce, Minor Victim 1, an individual who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense, specifically, Sexual Misconduct with a Minor under Indiana law (IC 35-42-4-9 (a) and (1)), and Aggravated Sexual Assault of a Minor under the Age of 16 under New Jersey law (NJ Rev. Stat Sec. 2C:14-2), in violation of Title 18, United States Code, Section 2422(b).

In summary, Arnold Castillo used social media and gaming to communicate with a child. He knew she was vulnerable, and he knew what he needed to say and do to trick her into believing that he loved her and had her best interests in mind. In reality, the only thing Mr. Castillo wanted from Minor Victim 1 was to have sex with her.

Mr. Castillo lured a fifteen year old child 700 miles away from her family and had sex with her for eight days. He continued to hold her and have sex with her even after he knew that her family and law enforcement were trying to bring her home. There are no words for this kind of criminal behavior. The nature and circumstances of this case are extremely aggravating. Mr. Castillo must be punished for these offenses.

B. History and Characteristics of the Defendant

Mr. Castillo's history and characteristics are both aggravating and mitigating. The mitigating factors set forth in the PSR and the defense's filing at docket 54 will be addressed at sentencing.

In aggravation, Mr. Castillo had a history of communicating with minors online. During his interview with law enforcement, Mr. Castillo explained that he created video games and had a large following on YouTube. That proved to be true. When agents reviewed Mr. Castillo's social media and YouTube accounts, they observed a video that he uploaded on one of his YouTube

channels dated September 29, 2020. The title of the video was “Responding to the Document Allegations.” In the video, Mr. Castillo’s voice can be heard narrating over images that documented allegations that Mr. Castillo was a pedophile who was having inappropriate communications with minors online. Based on Mr. Castillo’s vocalized rebuttals, the allegations had been made by unidentified social media users who were minors. Those users had informed Mr. Castillo that they were teenagers, and nevertheless, Mr. Castillo made sexual advances and other derogatory remarks toward them. In his posted video, Mr. Castillo admitted that his comments were inappropriate but stated that they were supposed to be jokes.

FBI agents also located an additional video from Mr. Castillo’s YouTube channel concerning his behavior with children over Discord and Roblox. It was titled, “Jadon Shedletsky’ Roblox Predator.” In the video, an unidentified person (account name known but redacted) copied portions of Mr. Castillo’s posted rebuttal from his previously described video. The user also posted a series of screenshots between individuals who were presumably minors and Mr. Castillo. For example, on September 26, 2017, Mr. Castillo’s Discord account communicated with an individual whose username is known but redacted and referred to herein by pseudonym as “Primary Color.” Below are portions of this captured online interactions:

CASTILLO: “ah its fine. you’re 12, i expect you to be a little slow on the upbringing. but soon I’ll corrupt you beyond your wildest dreams. So no matter.

Primary Color: “I thought you were going to keep this our little secret... look what you did... now my clothes are dirty.”

CASTILLO: “well, guess you’re gonna have to take them off ;)))”

Primary Color: “No”

CASTILLO: “that just killed my expand dong. rip”

Primary Color: “Im 12 [...]”

CASTILLO: “you know what they say. the younger the better.”

Additionally, the unknown user posted screenshots of an ongoing second Discord conversation between Mr. Castillo and Primary Color that transpired between October 14, 2017, and October 20, 2017. Below are portions of Mr. Castillo’s comments to the reported juvenile:

CASTILLO: “i’ll rape you”

CASTILLO: “You’re the reason why I’m gonna end up behind bars”

The United States has not yet been able to verify whether the user of the Primary Color account (pseudonym) is in fact a minor. However, what is apparent is that Mr. Castillo believed he was in communication with several minors over social media and gaming. Despite publicly made allegations that he was a pedophile, Mr. Castillo didn’t stop. Instead, he went on to communicate with Minor Victim 1 and commit the instant offenses. This is someone with a longstanding problem.

C. Reflect the Seriousness of the Offense

This offense is incredibly serious. It was not impulsive—it was well planned. It took months and hundreds of messages to groom Minor Victim 1. It took money and presents and planning. It involved the use of multiple aliases, lies to law enforcement, spinning off platforms, and other diabolical behavior to pull off.

It was also cruel. Mr. Castillo knowingly placed Minor Victim 1’s family in fear that she had been kidnapped or killed. He also forever damaged the psyche of a young girl who simply wanted to be loved and accepted. The suffering she has endured is immeasurable. The fear in which he placed her family is unforgivable. Mr. Castillo’s calculated and callousness behavior demands a lengthy and serious sentence.

D. Afford Adequate Deterrence

The frequency of this type of criminal conduct in the country in general and the Southern District of Indiana in particular demands a serious sentence to deter this behavior and send a message to others contemplating committing crimes against children over the Internet that this conduct will not be tolerated. Social media and gaming such Roblox, Instagram, and Discord is extremely popular with children—and criminals like Mr. Castillo know it. General deterrence is of great importance here.

E. Safety of the Community and Specific Deterrence

The public needs protection from Mr. Castillo. This is not a crime in which Mr. Castillo will age out—he will continue to be able to commit offenses from the comfort of his own home behind a computer or device for decades.

V. Restitution

The defendant agrees to pay Minor Victim 1, as identified in the stipulated factual basis below, \$10,000 for the harm he proximately caused to Minor Victim 1 as a result of his criminal offenses.

Conclusion

A within guideline sentence and a Lifetime of supervised release is sufficient, but not greater than necessary, to reflect the seriousness of the offense, promote respect for the law, provide just punishment for the offense, protect the community from Mr. Castillo, and to afford adequate deterrence to criminal conduct. Mr. Castillo committed terrible crimes against a child and her family. They will feel the impact of that crime for a lifetime.

ZACHARY A. MYERS
United States Attorney

By: /s/ Tiffany J. Preston
Tiffany J. Preston
Assistant United States Attorney
Office of the United States Attorney
10 W. Market St., Suite 2100
Indianapolis, Indiana 46204-3048
Telephone: (317) 226-6333
Email: Tiffany.Preston@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on August 16, 2023, a copy of the foregoing GOVERNMENT'S SENTENCING MEMORANDUM was filed electronically. Parties may access this filing through the Court's system. Notice of this filing will be sent to the parties by operation of the Court's electronic filing system. A copy has also been provided to counsel of record via electronic mail.

By: /s/ Tiffany J. Preston
Tiffany J. Preston
Assistant United States Attorney
Office of the United States Attorney
10 W. Market St., Suite 2100
Indianapolis, Indiana 46204-3048
Telephone: (317) 226-6333
Email: Tiffany.Preston@usdoj.gov