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Attorney for Defendant Sales

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

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RICHARD MACADANGDANG SALES,

Defendant.

Case No. 6: 17-CR-00455-AA

**DEFENDANT SALES'
SENTENCING MEMORANDUM**

COMES NOW the defendant, Richard Macadangdang Sales, through counsel, Richard L. Fredericks, and respectfully submits this sentencing memorandum. A hearing for imposition of sentence is scheduled for October 26, 2021. A restitution hearing is scheduled for December 13, 2021.

1. Presentence Report

The defense disagrees with the narrative of events set out in paragraphs 14 to 20 of the presentence report. However, given that the Government, the defense, and Probation all agree that

a “timed served” sentence is appropriate, there appears to be no benefit to attempting to sort through a dizzying mishmash of information.

2. Mr. Sales’s Personal Information

Mr. Sales is 72 years old. He is recently divorced and lives by himself in a modest apartment in Eugene. Mr. Sales is unemployed and probably unemployable. He has no significant financial assets. He subsists on a Social Security benefit of \$924 per month. Mr. Sales does not have a meaningful support network of family or friends.

As a young man, Mr. Sales served abroad in the Army. After being honorably discharged, Mr. Sales spent the majority of his life working overseas; he maintained a home base in Kent, Washington. Mr. Sales has never before been charged with a crime.

Mr. Sales’ health is not robust. During the pendency of this case he has experienced heart issues and his medical team has considered a bypass surgery or the implantation of a pacemaker. Mr. Sales is currently being monitored for his heart condition. His medical team suspects that situational stress has contributed to his heart condition and they are hopeful his condition will improve when this case is behind him.

As mentioned, Mr. Sales has a subsistence level of income. Throughout the long pendency of this case, he has resided alone in a modest apartment in Eugene. Mr. Sales’ rent and bare bones monthly expenses exceed his income. He has been able to maintain his apartment in large part due to pandemic rental assistance. That aid is now over and Mr. Sales can no longer afford housing in Eugene. He has been invited to live with an old friend, Mariana Hightower, in Key West, Florida, and Mr. Sales would like to avail himself of that opportunity.

3) Sentence

The defense asks the court to impose the agreed upon sentence of time served followed by three years of supervised release. Mr. Sales asks the court to transfer his supervision to the District of Florida.

Respectfully Submitted this 22nd day of October, 2021.

Respectfully submitted,

/s/ Richard L. Fredericks

Richard L. Fredericks, OSB 832034
Attorney for Defendant Sales