

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

|                          |   |                           |
|--------------------------|---|---------------------------|
| UNITED STATES OF AMERICA | ) |                           |
|                          | ) |                           |
| V.                       | ) | Case No.: 1:23-CR-029-APM |
|                          | ) |                           |
| BOBBY WAYNE RUSSELL      | ) |                           |

**Second Supplement to Downward Variance and  
Sentencing Memorandum with Additional Letter**

Comes now Bobby Wayne Russell, by and through counsel, and supplements his motion for downward variance and sentencing memorandum by filing a character letter from Hailey Henderson.

Respectfully submitted,

KEVIN L. BUTLER  
Federal Public Defender

/s/Jake Watson  
Jake Watson  
Assistant Federal Public Defender  
Office of the Federal Public Defender  
Northern District of Alabama  
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**CERTIFICATE OF SERVICE**

I hereby certify that on November 16, 2023 I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to all parties of record.

Respectfully submitted,

**/s/Jake Watson**

Jake Watson