

C. Renée Manes
Assistant Federal Public Defender
Email: Renee_Manes@fd.org
101 SW Main Street, Suite 1700
Portland, OR 97204
Tel: (503) 326-2123
Fax: (503) 326-5524

Attorney for Defendant

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

UNITED STATES OF AMERICA,

Case No. 1:21-cr-00492-RDM

Plaintiff,

**DEFENDANT'S SENTENCING
MEMORANDUM**

v.

JEREMY GRACE,

Defendant.

I. INTRODUCTION

Mr. Jeremy Grace presents the following memorandum and accompanying exhibits for consideration by this Court at the time of his sentencing on June 9, 2022, based on his plea of guilty to a charge of Entering or Remaining in a Restricted Building or Grounds, a Class A Misdemeanor, in violation of 18 U.S.C. § 1752(A)(1).

For the reasons presented herein, a probationary sentence, along with the restitution obligation and the special assessment, are the most appropriate sentence. Such a sentence will be sufficient to punish Mr. Grace's conduct, particularly in light of the collateral consequences he has already

suffered, while not being harsher than necessary to accomplish the sentencing goals set forth in 28 U.S.C. § 3553(a), as required by *Kimbrough v. United States*, 552 U.S. 85, 101 (2007).

Mr. Grace understands the serious nature of the January 6th event, and contrary to the government's contention, he is remorseful for his conduct as he states in his letter to this Court which is provided as Exhibit A.¹ This memorandum will provide additional information on who Mr. Grace is as an individual; discuss in more detail his conduct on January 6th; and, address the government's sentencing contentions including the comparative sentencing information provided in the government's exhibit.

II. THE BACKGROUND OF JEREMY GRACE

A. Mr. Grace's First Love, His Family, Who He Supports And Helps In Any Way He Can.

Jeremy Grace is the second of six children, and the oldest boy, in the Grace family. He has always lived in the Pacific Northwest, except when he joined the Navy after graduating six months early from high school. After his honorable discharge, Mr. Grace returned to Washington and married Jenna Grace, his wife for the last thirteen years. Together they have two children, Avalee and Weston. Mrs. Grace is an elementary school teacher and she worked at Orchard Elementary until the pandemic, when she stayed home to teach their children.

Mr. Grace has always been a caring, supportive and incredibly helpful member of his large and extended family. Letters of support from numerous family and friends are provided as Exhibit B, and come from:

Steve and Laura Allen, uncle-and-aunt-in-law
Jennifer Beeks, Orchard Elementary
Debra Grace, mother

Tristan Allen, cousin-in-law
Avalee Grace, daughter
Jenna Grace, wife

¹ The Exhibit List for Mr. Grace is provided at the end of this memorandum.

Weston Allen, son
Morgan Mcilory, youngest sister
Viki Salyers, mother-in-law
Bob and Irene Weisend, grandparents-in-law

Courtney McKay, middle sister
Amber Sandine, oldest sister
Bill Spring, uncle-in-law

Mr. Grace's younger sister, Mrs. Courtney McKay, remembers how responsible her older brother was in taking care of her and the other siblings while their father traveled for work, as her letter states:²

[W]hen we were little Jeremy would constantly step up and take on responsibilities above and beyond his own. With having my dad be a long haul truck driver and Jeremy being the oldest boy in the house he learned at a young age how to work hard and to take care of the ones he loves. He was always looking out for all of his siblings and sacrificing for others. that is the core of Jeremys character and it has never waived. Being the driven person that Jeremy is he worked extremely to hard graduate high school early with honors and even sacrificed missing his own graduation ceremonies in order to take the opportunity to leave for basic training,

His oldest sister, Mrs. Amber Sandine, remembers her younger brother's dedication and drive, as well as how caring he was for his family members:

He was always the most logical and driven one. Even as a youth he was able to not eat his Halloween candy in a few nights and make it last for several months. Those candies he saved he also used to cheer one of us siblings up if we had a bad day or had hurt feelings. He has always carried empathy as a strong personality trait. Him and I were always trying to find ways to make a little cash when we were younger, and Jeremy got a job at an electrical shop and was able to pay cash for a truck before he was even 16. I was so amazed and proud that he was able to do that.

Mr. Grace's dedication to his family, and his willingness to sacrifice for them, is documented by his care and sacrifice of his mother-in-law after her husband died and she could no longer afford to live alone. First, he and Mrs. Grace sold one home and moved to a larger house so they could have her move in, and then he built his mother-in-law her own full apartment home adjacent to their home so she would always have a place to live and be comfortable. As Mrs. Viki Salyers explains:

² All letters are quoted as with errors in the original.

My husband had died a few years before I met Jeremy and I could no longer afford to live on my own. Jeremy and Jenna actually decided to sell their home and buy one big enough so that I could live with them. For 5 years, I lived in their home and got to see first hand their day to day lives. Jeremy is a family man. He loves playing with the kids. Often I would hear loud noises upstairs so I would step out of my room to listen and it was always Jeremy running around with the kids, having a great time being a kid himself. During my time with them Jeremy always made sure my living space was comfortable and what I needed. From there they decided to build me my own apartment attached to their house. As they began building I tried to imagine what it would be like and the product exceeded my expectations. They lovingly built me such a wonderful home where I have lived for the past 4.5 years.

As Mrs. Salyers' siblings, Steve and Laura Allen noted, Mr. Grace and his wife took on that project "at great expense . . . [m]aking sure [Mrs. Salyers] would have her own safe and comfortable place to live out the rest of her years . . . [h]ow many son-in-laws would take on the financial and emotional responsibility to do that for a mother-in-law?"

Mr. Grace is always willing to help. Bill Spring, his Uncle-in-Law, has stated "anytime I need something fixed or have a question Jeremy is always there to help." And it isn't just his family. Jennifer Beeks, Orchard Elementary School's Family & Community Resource Center Coordinator, who met Mrs. Grace when she worked at the school, reports:

I often had families in need of items or support for resources, food, clothing, *etc.* The Grace family was always offering to help, donate and support families in need at our school.

The letters from all of Mr. Grace's family and friends show how vital and important he is in their lives, especially the lives of his children, Avalee and Weston. Both children have written letters that are provided within Exhibit B. In addition, provided as Exhibit G is a video with statements from Avalee, Weston, Mrs. Jenna Grace, Mrs. Vicki Salyers, and documenting Mr. Grace at work.

B. Mr. Grace's Incredible Work Ethic And Skills, Which Are Recognized By His Employers, Customers And Co-Workers.

Mr. Grace has always had a strong work ethic, and takes pride in his role as the sole support of his wife, children and mother-in-law. Mr. Grace is a Journeyman Electrician, who works with a small start-up company, ALCO Electric, which he joined as it was forming. ALCO Electric focuses on electrical installation in commercial builds, and he has a vital role in that company as a foreman for work crews of 4-5 employees. Mr. Grace is respected by his employers, fellow-workers, and the people in the companies he serves. Exhibit D are letters of support from such individuals, including:

Brian Alexander, ALCO Electric	James Loucks, Contractor
Bradley Spencer, Contractor	Jason Ray, Co-Worker

Brian Alexander of ALCO Electric explains how he met Mr. Grace and why he is so vital to their company:

I own ALCO [and ...] I've worked with Jeremy since 2008, I remember speaking with Jeremy the day he hired on he explained he had joined the military right out of high school served his 4-years and then started with a residential electrical contractor receiving his residential Journeyman license in just 2-years and had just been accepted to the union 5-year apprentice program to be a commercial electrician. . . . By the end of Jeremy's 5-year apprenticeship he had already been promoted to a foreman position. . . I decided to make the leap and start my own business when Jeremy made the move with me, he is now our Superintendent in charge of field personnel and project management. Jeremy has been instrumental in helping develop a team at ALCO Electric as well as maintaining our customer following, he always puts the customer first and makes sure our employees have everything they need to be successful and safe. I honestly believe it's the little things Jeremy does that keep our work force (currently 10) growing and excited to be a part of ALCO. My overall perspective of Jeremy as his employer is I see a guy that loves to work hard and is always working toward a goal whether he's making the company money or helping others become successful he's not just there to make a paycheck.

A co-worked, James Ray, confirms Mr. Grace's importance to this small business:

Since we joined the small startup company, Alco Electric, last year Jeremy has been a key component to its success and growth. He consistently manages multiple projects and supervises half of the employees at the company which is usually 4-6 of

our 10 employees. Return customers ask for him by name and request he manage their upcoming projects. He also draws talent to the company because workers in our industry who know and respect him want to come work with him and the team he is helping to build at Alco Electric. Jeremy has the drive necessary to grow a small company like ours and help keep the employees in a safe, positive, and successful environment.

The business entities that Mr. Grace's work serves also respect Mr. Grace, and the skill and competency that he brings to every job. Individuals he has worked with on such projects will repeatedly ask for Mr. Grace on their next project as Mr. Spencer Bradley confirms:

Jeremy and I first met in 2015 working on a remodel project in East Portland. I was working as the Project Manager and Jeremy was the foreman for the electrical contractor on the project. Our whole team hit it off immediately with Jeremy, embracing his positive attitude, strong work ethic, and willingness to help out the project however he could. Although Jeremy only had the one project under his belt as a field leader, we requested him to lead the electrical team on a 12-story hotel project downtown, the largest project our company had taken on at the time. His strong character and transparent, ethical approach were key in the successful execution of the project, which wrapped up in 2018.

Often the individuals with whom he works become close friends, and one of the numerous individuals to whom Mr. Grace will always volunteer his time and skills, as Mr. James Loucks details:

I first met [Jeremy] him when we were building our new headquarters for my current employer. This project was a massive undertaking to say the least and Jeremy was lead electrical superintendent on site. The scope of work spanned months and Jeremy was responsible for every electrical detail in that building. Having a guy like him on site makes our job a lot easier. I always trust he will do what he says and can always count on him and his team when it comes down to it. Not once has he let me down on or off the job.

[Jeremy] is extremely personable and gets along great with everyone on site. I constantly hear from other sub-contractors about how nice he was to work with and how his work stands out above others. He has come over on his days off to help me with electrical projects at my house. We live over an hour from each other, and he still does it.

Mr. Grace is a trusted and respected member of his small company, ALCO ELectric, and a critical component of their success.

C. Mr. Grace's Service To His Nation.

As his sisters noted, Mr. Grace graduated high school early so that he could enlist in the United States Navy and serve his Country. Mr. Grace served four years, rising to an E5 before his Honorable Discharge. Mr. Grace earned the Sea Service Deployment Ribbon, a Meritorious Unit Commendation, a Global War on Terrorism Medal, and the Navy and Marine Achievement Medal. Copies of his Naval records are provided as Exhibit D.

The government contends that the fact that Mr. Grace is a Veteran should aggravate the fact that he became involved with the events of January 6th. That is not accurate. Mr. Grace's genuine love and respect for our Country is one of the reasons why his actions that day were, in fact, very limited. Mr. Grace neither committed nor condoned any acts of violence, but was swept up in events, as were so many other individuals that day.

III. MR. GRACE'S CONDUCT ON JANUARY 6TH

On February 25, 2022, Mr. Grace spoke with agents from the Federal Bureau of Investigation and detailed his conduct leading to January 6th, and his actions that day. In addition, some of Mr. Grace's conduct is documented in the video we are providing as Exhibit H.

As Mr. Grace told the FBI, he had wanted to see former President Trump speak. Mr. Grace's father, Jeffrey Grace,³ knew a man named Travis, who bought the tickets and arranged for a hotel room for the three of them, and they reimbursed him. From his conduct, it appears that Travis is a

³ Jeffrey Grace is charged in *United States v. Jeffrey Grace*, Case No. 1:21CR296-**-001 (D.C. D.C.)

member of the Proud Boys. Mr. Jeremy Grace is not a member of the Proud Boys. He attended one rally years ago, but he has never joined that entity.

While they were in D.C., Travis took Mr. Grace and his father to a barbecue where there were many members of the Proud Boys. Mr. Grace remembers the conversation being about expecting violence from ‘Antifa’ protestors, and there had recently been violence between those two groups in the District.⁴ The next day, Mr. Grace went with his father and Travis to the rally organized by former President Trump. Travis met up with some other individuals, who Mr. Grace believed to be Proud Boys, and they walked towards the Capital. They stopped at food trucks along the way, and waited to see if former President Trump would drive by, as they expected him to do so.⁵ Mr. Grace threw aside one barricade which had fallen over on the walking path.

Mr. Grace and his father originally approached from the lawn, but were part of a group that was tear gassed. He and his father then walked around back, where they assisted another individual who had also been tear gassed and couldn’t see. They followed a crowd through an open door, turned right and entered the Rotunda.

Mr. Grace found himself in awe of the beauty and majesty of the space, and he took pictures of himself and his father. While they were there, he saw that some of the stanchions had been knocked over and he picked them up and rehung the ropes. His father took a bar from someone else and gave it to a police officer, who told them to be safe. They stayed inside for around twenty minutes, but

⁴ See <https://www.newsweek.com/proud-boys-washington-antifa-protest-stabbing-1554489>.

⁵ Former President Trump did inform the attendees at the Rally that he would go with them to the Capital, and recent revelations from the hearings before the Select Committee to Investigate the January 6th Attack on the United States Capital have confirmed that this was the former President’s plan. See <https://january6th.house.gov/legislation/hearings>.

when they began to see some people breaking things and the individual carrying the Speaker's podium, they decided to leave because they did not believe in, or stand for, things being broken.

As police were blocking a door, they climbed through the broken window. Outside they continued to take pictures, including together. And Mr. Grace joined chants with others about the capital being "Our House."

Mr. Grace is not claiming that he believed the Capital was open, nor is he denying that he saw tear gas being used and that the Capital Police were trying to keep the mob from moving forward into the Capital. As he has expressed in his letter, again provided as Exhibit A, Mr. Grace regrets that he joined the mob that day, and is sorry that individuals within that mob became violent and destructive – that was not what he had envisioned or intended.

Mr. Grace is not one to express his feelings, but those who know him closely know how difficult the last year and a half has been. As Brian Alexander, owner of ALCO Electric states:

As an employer often you can tell when someone is dealing with a personal issue outside of work, Jeremy has continued to be a great employee and father, I know him well enough even though he was not involved in acts of violence I can tell he is very regretful of the pain caused by his presence on January 6th.

Mr. Grace does sincerely regret what his behavior on January 6th brought on, including the pain to his family members. That is why Mr. Grace debriefed with the FBI, pled guilty, cooperated fully with the Pre-Sentence process, and is awaiting sentencing.

IV. OTHER FACTORS AFFECTING THE SENTENCING

A. Comparisons With Other Cases

The government has provided an exhibit showing the sentences requested, and imposed on, individuals charged with crimes arising from the January 6th attack on the Capital. However, most

of those individuals were not convicted of the same crime as Mr. Grace, and it is therefore not appropriate to compare their sentences. Instead, the conduct of Mr. Grace should be compared to that of other individuals who were sentenced for violations of 18 U.S.C. § 1752(A)(1), and Exhibits E and F are two charts that have excised that information for this Court.

Exhibit E is a list of all individuals on the government's chart that were sentenced for violations of 18 U.S.C. § 1752(A)(1), in alphabetical order. The Chart details the custodial sentence sought by the government, the custodial sentence (if any) imposed by the court, and the factors in aggravation presented in the government's sentencing memorandum. Then, Exhibit F contains the same information but is organized by length of any custodial sentence imposed. Further, for ease of reference, Exhibit F subdivides the cases into: cases where no custodial sentence was imposed; cases where only home confinement was imposed; and, cases where some form of custodial sentence was imposed, whether to be served intermittently or concurrently.

Reviewing the various aggravated factors presented by the government in these cases, there are several patterns that emerge. Specifically, individuals who received custodial sentences usually engaged in one, or several, of the following behaviors:

- They posted on social media prior to the event, and often those postings anticipated that violence would occur, including:

Baranyi, Lawrence, 1:21-CR-00062-JEB, sentenced to 90 days incarceration
Herendeen, Daniel, 1:21-CR-00278-BAH, sentenced to 14 days incarceration
O'Brien, Kelly, 1:21-CR-00633-RCL, sentenced to 90 days incarceration
Reed, Blake, 1:21-CR-00204-BAH, sentenced to 42 days intermittent confinement
Ridge IV, Leonard, 1:21-CR-00406-JEB, sentenced to 14 days incarceration consecutive
Winn, Dana, 1:21-CR-00139-TNM, sentenced to 10 days incarceration (weekends)

- They came prepared for violence, including by bringing body armor or similar items, including:

Herendeen, Daniel, 1:21-CR-00278-BAH, sentenced to 14 days incarceration
Reed, Blake, 1:21-CR-00204-BAH, sentenced to 42 days intermittent confinement

Schornak, Robert, 1:21-CR-00278-BAH, sentenced to 28 days intermittent incarceration

- They witnessed violence directly against officers, or other illegal activity, but did not immediately leave, including:

Baranyi, Lawrence, 1:21-CR-00062-JEB, sentenced to 90 days incarceration

Herendeen, Daniel, 1:21-CR-00278-BAH, sentenced to 14 days incarceration

Hernandez, Emily, 1:21-CR-00747-JEB, sentenced to 30 days incarceration

Johnson, Adam, 1:21-CR-00648-RBW, sentenced to 75 days incarceration

McCreary, Brian, 1:21-CR-00125-BAH, sentenced to 42 days intermittent incarceration

O'Brien, Kelly, 1:21-CR-00633-RCL, sentenced to 90 days incarceration

Reed, Blake, 1:21-CR-00204-BAH, sentenced to 42 days intermittent confinement

Ridge IV, Leonard, 1:21-CR-00406-JEB, sentenced to 14 days incarceration consecutive

Schornak, Robert, 1:21-CR-00278-BAH, sentenced to 28 days intermittent incarceration

- They paraded around with stolen property, or tried to leave with such property, including:

Courtright, Gracyn, 1:21-CR-00072-CRC, sentenced to 30 days incarceration

Hernandez, Emily, 1:21-CR-00747-JEB, sentenced to 30 days incarceration

Johnson, Adam, 1:21-CR-00648-RBW, sentenced to 75 days incarceration

Schornak, Robert, 1:21-CR-00278-BAH, sentenced to 28 days intermittent incarceration

- They penetrated fairly far into the capital or into a sensitive area, including:

Baranyi, Lawrence, 1:21-CR-00062-JEB, sentenced to 90 days incarceration

Bonet, James, 1:21-CR-00121-EGS, sentenced to 3 months incarceration

Courtright, Gracyn, 1:21-CR-00072-CRC, sentenced to 30 days incarceration

Gold, Simone, 1:21-CR-00085-CRC, sentenced to 60 days incarceration

Hernandez, Emily, 1:21-CR-00747-JEB, sentenced to 30 days incarceration

Johnson, Adam, 1:21-CR-00648-RBW, sentenced to 75 days incarceration

McCreary, Brian, 1:21-CR-00125-BAH, sentenced to 42 days intermittent incarceration

Reed, Blake, 1:21-CR-00204-BAH, sentenced to 42 days intermittent confinement

Ridge IV, Leonard, 1:21-CR-00406-JEB, sentenced to 14 days incarceration consecutive

- They posted on social media during the event or after, bragging about the event and their participation, including:

Baranyi, Lawrence, 1:21-CR-00062-JEB, 90 days incarceration

Bonet, James, 1:21-CR-00121-EGS, 3 months incarceration

Courtright, Gracyn, 1:21-CR-00072-CRC, 30 days incarceration

Herendeen, Daniel, 1:21-CR-00278-BAH, 14 days incarceration

Johnson, Adam, 1:21-CR-00648-RBW, 75 days incarceration

McCreary, Brian, 1:21-CR-00125-BAH, 42 days intermittent incarceration

O'Brien, Kelly, 1:21-CR-00633-RCL, 90 days incarceration

Reed, Blake, 1:21-CR-00204-BAH, 42 days intermittent confinement
Ridge IV, Leonard, 1:21-CR-00406-JEB, 14 days incarceration consecutive
Schornak, Robert, 1:21-CR-00278-BAH, 28 days intermittent incarceration
Winn, Dana, 1:21-CR-00139-TNM, 10 days incarceration (weekends)

Such behavior occurred to a greater or lesser degree for each of these individuals, as summarized in Exhibits E and F, and looking at these summaries explains why these particular individuals were deemed to deserve the various sentences that were imposed.

Mr. Grace did not engage in this type of behavior. Mr. Grace made no social media posts before or after bragging about his participation. Mr. Grace did not prepare to undertake any violence – other than that he was concerned that “Antifa” would attack rally goers. Mr. Grace only made it as far as the Rotunda, and never took any property - in fact, Mr. Grace acted to replace the stanchions that had been knocked over. When Mr. Grace began to witness destructive behavior, he left. Mr. Grace’s behavior was far more consistent with that of individuals who did not receive any type of custodial sentence, or received at most a sentence of some home detention.

B. The Government’s Alleged Aggravating Factors.

The government focuses on several factors it contends justify a sentence of incarceration, a few of which merit a response.

Initially, the government would like to link Mr. Grace with the Proud Boys – calling him “adjacent” to that group. Mr. Grace specifically denies any affiliation with that entity. It is true that his father knows Proud Boys, and Mr. Grace may also know some individual who are members, but has never joined nor sought to join that organization. Mr. Grace answered all of the FBI’s questions regarding what he knew of the Proud Boys and who he saw on the days before and after January 6th.

Next, it is true that Mr. Grace deleted some of his private videos and was not forthcoming with the FBI when initially questioned. It is unfortunate that Mr. Grace was not aware that he had a Fifth

Amendment privilege not to answer any questions from the FBI, and instead should have consulted with a lawyer and shown them the videos. This type of conduct is not uncommon for individuals who are not familiar with the criminal justice system, who do not fully understand their rights, and who may panic when they learn that – for the first time in their life – they may have done something very serious and illegal. However, Mr. Grace did debrief with the FBI, and he has not sought to deny any conduct that were on the videos.

In terms of the “Our House” business, that is an LLC set up by Mr. Grace’s father, Jeffrey Grace.⁶ Mr. Grace is not his father. Notably, Jeffrey Grace continuously posts on social media, including his FaceBook account, with the most recent posts evidencing his firm intention to reject any plea and proceed to trial in his case.⁷ That is not Mr. Jeremy Grace’s decision. While Mr. Grace is not his father, he is a man who has always – always – helped his family when he can, and who takes seriously the Commandment to honor his mother and father. Nothing Mr. Grace has done to help his father sell goods has broken any laws, nor has it earned him any profits. There is no question that there are issues in the Grace family regarding the respective activities and decisions of Jeffrey and Jeremy, and Mr. Jeremy Grace is navigating these issues as well as he is able.

V. DISCUSSION OF A REASONABLE SENTENCE

In addition to the history and characteristics of Mr. Grace, 18 U.S.C. § 3553(a)(2) requires that a sentence also: (a) reflect the seriousness of the offense, promote respect for the law, and provide just punishment; (b) afford adequate deterrence to criminal conduct; (c) protect the public from

⁶ See <https://www.ourhouseusa.net/>.

⁷ See <https://www.facebook.com/jeff.grace.716>

further crimes by the defendant; and, provide the defendant with needed educational or vocational training, medical care, or other correctional treatment in the most effective manner.

Mr. Grace will never again commit such a crime – nor is he likely to commit any other crime – and he already has a career and is on a solid path to more success. Neither factors (c) and (d) require a sentence of incarceration.

As for factor (b), the need to deter such conduct in the future, incarcerating Mr. Grace will not accomplish that objection. First, Mr. Grace will not engage in such conduct in the future. As for other individuals who are likely to do so – there are individuals who will follow the “Big Lie” and former President Trump, and they will not be deterred by Mr. Grace’s incarceration – and possibly not even by their own.

As for (a), reflecting the seriousness of the offense, that is an important criteria. However, incarceration is not the only method of confirming those issues. The hearings before the Select Committee to Investigate the January 6th Attack on the United States Capital are currently the best way to educate the general public about what occurred that lead to these events, what occurred that day, and what has transpired thereafter. It is these Hearings that will demonstrate how serious the behavior was of the various actors involved.

As for teaching Mr. Grace himself of the seriousness of his conduct, that is a lesson that he is already learning. His company lost a project at the Portland International Airport due to the fact that he was not approved to work there, and Mr. Grace may face limitations on his ability to work on any government related project for a significant period. Mr. Grace is dealing with the tensions and issues within the family that are taking an emotional toll on Mr. Grace and everyone involved. Knowing that one’s children are in fear that a person will be taken away from them and incarcerated is one of

the greatest nightmares a parent can face, and Mr. Grace is living with that nightmare. Mr. Grace will be subject to his restitution order, and he will have to spend a period of time on probation under the constraints imposed by this Court and his Probation Officer. And there will always be a record that Mr. Grace was one of the individuals who joined an attempted insurrection on January 6, 2021; history will remember his actions and those of the other participants, and the collateral consequences from that participation are just beginning to be known. As Mr. Grace states in his letter, he knows that God has given him this path to learn the lessons that he needs to learn, and he is doing so.

VI. CONCLUSION

In light of all of the information presented herein and the additional information to be discussed at the time of sentencing; and based on who Mr. Grace is and how he has lived his life on every day but January 6, 2021; a probationary sentence is sufficient to punish Mr. Grace for his conduct that day.

Respectfully submitted, this 1st day of July, 2022.

/s/ C. Renée Manes
C. Renée Manes
Attorney for Defendant

DOCUMENTARY EXHIBITS

<u>Exhibit</u>	<u>Description</u>
A	Letter of Jeremy Grace
B	Letters of Support – Family, including Steve and Laura Allen, uncle-and-aunt-in-law Tristan Allen, cousin-in-law Jennifer Beeks, Orchard Elementary Avalee Grace, daughter Debra Grace, mother Jenna Grace, wife Weston Grace, son Morgan Mcilory, youngest sister Courtney McKay, middle sister Viki Salyers, mother-in-law Amber Sandine, oldest sister Bill Spring, uncle-in-law Bob and Irene Weisend, grandparents-in-law
C	Letters of Support, Work Brian Alexander, ALCO Electric Spencer Bradley, Contractor James Loucks, Contractor Jason Ray, Co-Worker
D	Naval Service Records
E	Comparison Sentencing Chart, Alphabetically
F	Comparison Sentencing Chart, Length

VIDEO EXHIBITS

G	Video of Family and Work
H	Video of Conduct in Capital