

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

21-CR 643 (CKK)

KAREGAN BOSTIC

MEMORANDUM IN SUPPORT OF PROBATION

Karegan Bostic moves this Honorable Court to adopt the recommendation of United States Probation Officer Aidee Gavito, and to impose a Sentence of Eighteen Months Probation. As Probation Officer Gavito states:

"It is recommended that a sentence of 18 months (1 year, 6 months) probation be imposed in this case. The recommended sentence would best meet the sentencing objectives outlined in 18 USC § 3553(a). The proposed sentence is sufficient, but not greater than necessary, to promote respect for the law, to provide just punishment for the offense, to afford adequate deterrence to criminal conduct, and to protect the public from further crimes of the defendant. A probationary sentence would serve to protect the community and fulfill the goals of deterrence and punishment for the defendant. The recommended term of probation will allow the US Probation Office the opportunity to facilitate the defendant's completion of the recommended special conditions: payment of restitution, special assessment fee, community service, firearm restriction, financial disclosure, and restitution obligation."

Sentencing Recommendation: Document 91

According to the Government, Karegan was inside the Capitol less than five minutes. There is no evidence she damaged any property or injured anyone. There is no evidence of any postings by Karegan at any time. Since her release from custody in June 2022, she has been one hundred percent compliant with Pre-Trial Services. She follows court directions and obeys Pretrial Services' rules and regulations. She telephones weekly.

Karegan is not political. On January 6, 2021, she had no understanding about the Electoral Count scheduled to take place in the Capitol. Other than her generic support for the sitting president, she had minimal political purpose.

Karegan has always lived with her parents and has never lived independently. Her worldview growing up came from her family, her church and the conservative community in which she lives. For Karegan, the instant offense is truly aberrant conduct. She thought she was showing patriotic support for President Trump. She followed her father and sister inside the Capitol, remained inside a few minutes and then exited with them.

Karegan was very shaken by what she saw in the news about January 6th, 2021. She was terrified after her father and sister were arrested. She has been extremely anxious since her own arrest in May of 2022. At her Presentment on May 31, 2023, she passed out. She was so overwrought at the time of her initial change of plea hearing, on October 25, 2022, she had difficulty responding to the Court's questions. The plea was adjourned until October 31, 2022, when she was more calm and able to proceed.

In February 2023, Karegan met with the FBI to allow agents to review her cell phones and download the content. She was forthcoming, honest and compliant. No postings were discovered on her phones.

Karegan is a hard-working young woman. At this moment she has two jobs. She is employed as a health care worker and operates a hyperbaric chamber. She is working toward certification. She also works as a "nanny" and as a house sitter. Recently she matriculated at Regent University, where she plans to major in psychology.

As to the offense conduct, Karegan's culpability is minimal in contrast with rioters who destroyed or stole government property or those who assaulted or threatened law enforcement officers. She is a very motivated young woman and will be successful on probation. She wishes to make early payment of restitution and court costs and will complete any hours of

community service--as soon as she is able, considering her employment and school commitments.

Has this misdemeanor charge been brought in D.C. Superior Court, Karegan would qualify for Sentencing under the Youth Rehabilitation Act. The conviction would have had the possibility of expungement, once the term of probation was completed successfully. She has not been afforded this benefit.

In order to promote understanding and empathy Karegan has been reading history books and novels, including Maus, and The Grapes of Wrath. She also has watched many hours of the House Select Committee Hearings on January 6th, with the desire to better inform herself. She researched the lives and personal histories of other young people who came the Capitol on Jan. 6th, 2021 to learn what has happened to them. She believes that divisive politics is bad for our country. She regrets that the events of January 6th caused more division. She hopes for harmony and healing for our country. She wishes to work in her community to promote peace and to end the angry political discourse. Young women like Karegan can promote beneficial social change.

I urge the Court to follow the recommendation of the Office of United States Probation and to place Karegan Bostic on Probation for a period of

eighteen months. The Court will have an opportunity to address any questions or concerns to Karegan at Sentencing.

Respectfully submitted,

_____/s/_____

H. Heather Shaner. #273276
Appointed by the Court for Karegan Bostic
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