

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

UNITED STATES OF AMERICA

V.

TIMOTHY LOUIS HALE-CUSANELLI,

Defendant.

Case No. 21-cr-37-TNM

NOTICE OF SUPPLEMENTAL AUTHORITY

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, hereby submits notice of supplemental authority to aid the Court in sentencing in the above-captioned matter. Attached to this notice are excerpts of sentencing transcripts in *United States v. Matthew Ryan Miller*, 21-cr-75-RDM, Tr. May 23, 2022; *United States v. Greg Rubenacker*, 21-cr-193-BAH, Tr. May 26, 2022; *United States v. Guy Reffitt*, 21-cr-32-DLF, Tr. Aug. 1, 2022. These transcript experts include the respective findings of Judge Moss, Chief Judge Howell, and Judge Friedrich regarding the enhancements under U.S.S.G. §§2J1.2(b)(1)(B) and (b)(2), and each's conclusion that the enhancements applied to those defendants' offenses under 18 U.S.C. § 1512(c)(2).

Respectfully submitted,

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By: /s/
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