UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA **v.** **CODY PAGE CARTER CONNELL & DANIEL PAGE ADAMS,** **Defendants.**	**Case No. 21-cr-84 (PLF)**

GOVERNMENT'S RESPONSE TO THE COURT'S ORDER

The United States, by and through its attorney, the United States Attorney for the District of Columbia, hereby provides this response to the Court's January 18, 2024. ECF 129. In its order, the Court instructed the parties to provide revised guidelines in this case that provided a guidelines range for the defendants if neither had been convicted of 18 U.S.C § 1512(c)(2). ECF 129 at 1.

In providing this counter-factual analysis, the government notes that at sentencing, the Court must calculate the Guidelines range for each count of conviction, including the § 1512(c)(2) conviction. U.S.S.G. § 1B1.1(a)(4). "'[F]ailing to calculate (or improperly calculating) the Guidelines range' is 'significant procedural error.'" *United States v. Brown*, 892 F.3d 385, 400 (D.C. Cir. 2018) (quoting *Gall v. United States*, 552 U.S. 38, 51 (2007)).

As the Court knows, the Supreme Court is reviewing the scope of 18 U.S.C. § 1512(c). *United States v. Fischer*, 64 F.4th 329 (D.C. Cir. 2023), *cert. granted*, No. 23-5572 (Dec. 13, 2023). Even assuming that the Supreme Court narrows the scope of the statute, the government does not concede that the defendants' sentencing guidelines range would necessarily change because they committed the assaults charged in Count Three with the intent to violate § 1512(c)(2). *Cf. United States v. Brock*, No. 23-3045, 2023 WL 3671002, at *2-3 (D.C. Cir. May 25, 2023) (Millett, J., concurring). As discussed in more detail below, in this scenario the defendants'

guidelines range is unchanged from that detailed in the government's prior sentencing memorandum: 46-57 months for Connell and 51-63 months for Adams. ECF 110 at 20-26.

In the theoretical scenario where these defendants were not, and could not have been, convicted under § 1512(c), and beyond that, could not have even intended to violate the statute, their guidelines range would change. Cody Page Carter Connell's offense level would be 17, resulting in a range of 27-33 months, while Daniel Page Adams' offense level would be 19, resulting in a range of 30-37 months. In this scenario, an upward variance would be appropriate under the § 3553(a) factors for the reasons stated in the government's original sentencing memo. *See* ECF 110 at 26-37.

The government maintains its original recommended sentence of 51 months' imprisonment for both defendants.

Guidelines Calculation

Had the defendants not be convicted of violating 18 U.S.C. § 1512(c)(2), the appropriate offense level computations for Counts One, Three, Four, and Five, before any grouping analysis under Part D of Chapter 3 or any credit for acceptance of responsibility are:

Count One: 18 U.S.C. § 231(a)(3) – Civil Disorder

Base Offense Level	14	U.S.S.G. § 2A.4, cross reference with adjusted based offense level under U.S.S.G. § 2A2.4(c)(1)
Specific Offense Characteristic – Official Victim	+6	U.S.S.G. § 3A1.2(b): "If the victim was a government officer or employee" then "increase by six levels."
Total	20	

Count Three: 18 U.S.C. § 111(a)(1) – Assaulting, Obstructing, Interfering, or Impeding Certain Officers (USCP Officers J.G., T.M., B.S., B.M., and J.D.)

Base Offense Level	14	U.S.S.G. § 2A2.2
Specific Offense Characteristic –	+6	U.S.S.G. § 3A1.2(b): "If the victim was a government

Official Victim		officer or employee" then "increase by six levels."
Total	20	

Count Four: 18 U.S.C. § 1752(a)(1) - Entering and Remaining in a Restricted Building or Grounds

Base Offense Level	4	U.S.S.G. §2B2.3(a)
Specific Offense Characteristic	+2	U.S.S.G. §2B2.3(b)(1)(A)(vii): the trespass occurred "at any restricted building or grounds."
Cross Reference		U.S.S.G. §2B2.3(c)(1) ("If the offense was committed with the intent to commit a felony offense, apply § 2X1.1 (Attempt, Solicitation, or Conspiracy) in respect to that felony offense, if the resulting offense level is greater than that determined above.") The defendants committed the assaults charged in Count Three with the intent to commit the felony offense of obstruction of a proceeding before Congress, in violation of 18 U.S.C. § 1512(c)(2), charged in Count Two.
Cross Reference	25 (see below for discussion)	U.S.S.G. § 2B2.3(c)(1): "If the offense was committed with the intent to commit a felony offense, apply U.S.S.G. § 2X1.1(a) in respect to that felony offense, if the resulting offense level is greater than that determined above U.S.S.G. § 2X1.1: "the base offense level from the guideline for the substantive offense, plus any adjustments from such guideline for any intended offense conduct that can be established with reasonable certainty."

The cross-reference under U.S.S.G. § 2B2.3(c), which applies when the offense is committed with the intent to commit another felony, applies here. Even if the defendants had not been charged with or had been acquitted of violations 18 U.S.C. § 1512(c)(2), this Court should find, by the applicable preponderance standard, that the evidence shows Connell and Adams'

conduct on January 6 was all intended to further their goal of obstructing Congress's certification of the election, conduct that constitutes a violation of 18 U.S.C. § 1512(c)(2).[1]

The evidence at trial established by at least a preponderance of the evidence that Connell and Adams attempted to, and did, knowingly obstruct an official proceeding. *See* ECF 100 (Statement of Facts for Stipulated Trial); *see also* ECF 110 at 3-17 (Government's Sentencing Memorandum). Knowing full well what was happening in the Capitol that day, Connell and Adams left the "Stop the Steal" rally and then went to the Capitol. There, after entering the restricted perimeter around the Capitol and entering the scaffolding that had been built over the Northwest Stairs, the Connell and Adams led the charge up those stairs to the Senate Wing Door. At the head of this column of rioters, Connell and Adams pushed five Capitol Police officers out of the way. They then cheered on the crowd as they breached the building, with Connell pulling the Senate Wing Door open himself. After assisting with and cheering on the breach the Capitol, they were among the first fifty rioters to enter the building. As they made the drive back to Louisiana after participating in the riot and in the days following, Connell and Adams both made statements indicating that their intent was to disrupt the proceeding taking place in the building that day:

[1] The law is clear that this conduct can be considered in connection with sentencing. *United States v. Jones*, 744 F.3d 1362, 1369 (D.C. Cir. 2014) (citing, *e.g., United States v. Settles*, 530 F.3d 920, 923 (D.C. Cir. 2008) ("[B]inding precedent of this court establishes that" "sentencing based on acquitted conduct" and "enhancing a sentence within the statutory range based on facts found by the judge, as opposed to the jury, do[ ] not violate the Sixth Amendment."). In applying the Guidelines, the Court must consider all "relevant conduct," without regard to whether the information would be admissible at trial. 18 U.S.C. § 3661. "Relevant conduct" is "broadly defined." *United States v. Abu Khatallah*, 41 F.4th 608, 645 n.23 (D.C. Cir. 2022). Under Section 1B1.3(a)(1)(A), a defendant's "relevant conduct" encompasses both the defendant's own acts and those that the defendant aided, abetted, counseled, commanded, induced, procured, or willfully caused. Finally, a defendant's "relevant conduct" under the Guidelines includes "all harm that resulted" from the defendant's acts or the acts of others engaged in the jointly undertaken criminal activity. U.S.S.G. § 1B1.3(a)(3).

Adams: "Every time an elected official operates outside the boundaries of the constitution we need to burn this motherfucker down until they start arresting people."

"Made it home. 2400 miles , 42 hours in three days. My voice was heard. I would rather die on my feet than live on my knees. Thanks for all the support. Good night y'all."

Connell: When asked "what was the reason to breaking in the Capitol….?" Connell responded, "[W]e breached it to let America know we're not standing down anymore."

"Hell yeah [congressmen and women] were scared. They didn't expect a couple old southern boys to get through all them damn police and knock the doors down!!! A revolution is coming.

In addition to these statements, Connell also made statements indicating his intent to return to Washington armed with long guns and, if necessary, to engage in a "civil war" against the elected government of the United States. *See* ECF 110 at 15-16. Connell then began acting on these plans by discussing purchasing firearms with certain individuals and stating that he did not intend to return to Louisiana unless it was in a body bag. *Id.*

All this shows, by at least a preponderance of the evidence, that Connell and Adams knowingly committed the offense charged in Count Four with intent to obstruct the certification proceeding on January 6, 2021.

Other judges in this district have applied the U.S.S.G. § 2B2.3(c) cross-reference based on similar conduct, even when the underlying 18 U.S.C. § 1752(a)(1) offense was a misdemeanor. *See*, *e.g.*, *United States v. Anthony Williams*, 21-cr-00377 (BAH), 9/16/2022 Sentencing Tr. at 49-51 (defendant found guilty of § 1512(c)(2)); *United States v. Bledsoe*, 21-cr-00204 (BAH), 10/21/2022 Sentencing Tr. at 76-78 (defendant found guilty of § 1512(c)(2)); *compare with United States v. Nicholas Rodean*, 21-cr-00057 (TNM), 10/26/2022 Sentencing Tr. at 5-11 (defendant not charged with § 1512(c)(2); court declined to apply the § 2B2.3(c) cross-reference to the

§ 1752(a)(1) misdemeanor conviction based on the case-specific facts—where in the court's assessment, the defendant did not intend to obstruct—but noted, "I think in many situations with many individuals the sum of the various pieces of evidence that the Government put forth at trial would certainly make out the guideline for obstruction of administration of justice [under the cross-reference]"). As explained by then-Chief Judge Howell in *Bledsoe*:

> The guideline at 2B2.3 applies to Count 2, charging: Entering and remaining in a restricted building or grounds, under 18 U.S.C. Section 1752(a)(1). This guideline provides a base offense level of 4 under the Guideline at Section 2B2.3(a). Two offense levels are added because the trespass occurred at a restricted building or grounds, under the Guideline at 2B2.3(b)(1)(A)(vii). It is then adjusted up to 25 offense levels pursuant to the guideline at 2B2.3(c)(1) and 2X1.1(a) because the offense was committed with the intent to commit the felony obstruction offense which adds up to 25 offense levels [pursuant to U.S.S.G. §2J1.2(a)] [. . .].

United States v. Bledsoe, 21-cr-00204 (BAH), 10/21/ 2022 Sentencing Tr. at 76-77 (defendant found guilty of § 1512(c)(2)).

Even when the defendant has been acquitted of violating 18 U.S.C. § 1512(c)(2), courts have found that, when a preponderance of the evidence shows that the defendant violated 18 U.S.C. § 1752(a)(1) with the intent commit another felony—that being obstruction of an official proceeding in violation of 18 U.S.C. § 1512(c)(2)—that conduct is an appropriate factor to consider at sentencing and the U.S.S.G. § 2X1.1 cross-reference applies. *See United States v. Thomas*, 21-cr-552 (DLF), 11/15/2023 Sentencing Tr. at 57-58 (applying the cross-reference to an 18 U.S.C. § 1752(a)(1) conviction when the defendant had been acquitted of 18 U.S.C. § 1512(c)); *see also United States v. Celetano*, 22-cr-186 (TJK) (same).

As in other cases, § 2X1.1(a) applies in this case, and so the base offense level is determined by application of § 2J1.2:

Base Offense Level (adjusted)	14	U.S.S.G. §2X1.1(a): "The base offense level from the guideline for the substantive offense, plus any adjustments from such guideline for any intended

		offense conduct that can be established with reasonable certainty." As discussed in more detail above and in the Government's Sentencing Memorandum (ECF 110), the evidence shows by a preponderance of the evidence that Connell and Adams entered the restricted area of the Capitol Grounds for the purpose of obstructing the official proceeding—that is, stopping or delaying Congress' work. The substantive offense is thus a violation of 18 U.S.C. § 1512(c)(2), and the base offense level for a violation that offense should be applied: U.S.S.G. §2J1.2(a) – Obstruction of Justice.
Special offense characteristic	+8	U.S.S.G. §2J1.2(b)(1)(B): "the offense involved causing or threatening to cause physical injury to a person, or property damage, in order to obstruct the administration of justice." For purposes of this enhancement, the "administration of justice" is synonymous with "official proceeding" as defined in 18 U.S.C. § 1515(a)(1), which, in the Capitol riot cases, refers to a "proceeding before the Congress," as defined in § 1515(a)(1)(B). There are multiple bases to apply this offense characteristic based on U.S.S.G. § 1B1.3 which encompasses (a) the defendant's own acts or omissions and, (b) those whom the defendant aided, abetted, counseled, commanded, induced, procured, or willfully caused. It also includes "all harm that resulted" from the defendant's acts or the acts of others engaged in jointly undertaken criminal activity with the defendant. § 1B1.3(a)(3). As described in the Government's Sentencing Memorandum (ECF 110), Connell and Adams rallied the crowd when they charged ahead on the Northwest Stairs and assaulted these officers by pushing against them and breaking through their police line. They timed their assaults against these officers to coincide with a moment when the officers' line was weak because of a chemical irritant that had just been sprayed at an officer's face. This conduct threatened physical injury to many officers, including the named assault

		victims in Count Three. Finally, the defendants also threatened or cause injury to property. Adams cheered on other rioters as they shattered the glass on either side of the Senate Wing Door, entered the building, and then broke the door open. Connell personally pulled the Senate Wing Door open, thus allowing hundreds of rioters to begin storming through this door into the building. The destruction of this door directly aided the mob's forward progress into the building and disruption of the congressional proceeding.
Special offense characteristic	+3	U.S.S.G. §2J1.2(b)(2): "the offense resulted in substantial interference with the administration of justice." For purposes of this enhancement, the "administration of justice" is synonymous with "official proceeding" as defined in 18 U.S.C. § 1515(a)(1), which in the Capitol riot cases refers to a "proceeding before the Congress, § 1515(a)(1)(B). The official proceeding of Congress's Joint Session, which was required by the Constitution and federal statute, had to be halted for almost six hours while legislators were physically evacuated for their own safety.[2]
Total	**25**	

Count Five: 18 U.S.C. § 1752(a)(2) - Disorderly and Disruptive Conduct in a Restricted Building or Grounds

Base Offense Level:	10	U.S.S.G. §2A2.4(a)
Specific Offense Characteristic	+3	U.S.S.G. § 2A2.4(b)(1) "If (A) the offense involved physical contact … increase by 3 levels." The defendants made physical contact with USCP Officers J.G., T.M., B.S., B.M., and J.D when they pushed and shoved them on the Northwest Stairs.
Cross reference		U.S.S.G. § 2A2.4(c): "If the conduct constituted aggravated assault, apply U.S.S.G. § 2A2.2(a) (Aggravated Assault)." The Application Notes to Section 2A2.2 define "aggravated assault" as a "felonious assault that involved … (A) a dangerous weapon with intent to cause bodily injury (i.e., not merely to frighten) with

[2] *See, e.g.*, *United States v. Calhoun*, 21-CR-116; *United States v, Reffit*, 21-cr-32.

		that weapon; (B) serious bodily injury; … or (D) an intent to commit another felony." U.S.S.G. §2A2.2 cmt n. 1. The conduct of Connell and Adam constituted aggravated assault because it was a felonious assault that involved the intent to commit another felony. The Guidelines do not define "assault" or "felonious assault." Sentencing courts have looked to the common law to define "assault" for Guidelines purposes. *See United States v. Hampton*, 628 F.3d 654, 660 (4th Cir. 2010). Assault encompasses conduct intended to injure another or presenting a realistic threat of violence to another. *See United States v. Dat Quoc Do*, 994 F.3d 1096, 1099 (9th Cir. 2021) (federal common-law assault includes (1) "a willful attempt to inflict injury upon the person of another," or (2) "a threat to inflict injury upon the person of another which, when coupled with an apparent present ability, causes a reasonable apprehension of immediate bodily harm.") (citations omitted); *Lucas v. United States*, 443 F. Supp. 539, 543-44 (D.D.C. 1977) (defendant assaulted a police officer, in violation of 18 U.S.C. § 111, where he "forcibly grabbed" the officer; § 111 "includes the lifting of a menacing hand toward the officer, or shoving him"), aff'd, 590 F.2d 356 (D.C. Cir. 1979). Here, Adam and Connell pushed and shoved a line of police officers. That conduct constituted aggravated assault because it was committed with the intent to commit another felony, namely, Obstruction of an Official Proceeding before Congress charged in Count Two and involved physical contact. Therefore, the cross reference to U.S.S.G. §2A2.2 applies.
Base Offense Level	14	U.S.S.G. § 2A2.2(a) Aggravated Assault
Specific Offense Characteristic – Official Victim	+6	U.S.S.G. § 3A1.2(b): "If the victim was a government officer or employee" then "increase by six levels."
Total	20	

The sentencing guidelines do not apply to Counts Six and Seven because those offenses are Class B misdemeanors.

Here, Counts 4 and 5 group because they involve the same victim: Congress. U.S.S.G. § 3D1.2. Counts 1 and 3 also group because they involve the same victims, USCP Officers J.G.,

T.M., B.S., B.M., and J.D. Finally, 1 and 3 group with Count 4 under U.S.S.G. § 3D1.2(c) because Counts 1 and 3 embody conduct that establishes a specific offense characteristic for Count 2, the eight-level enhancement under U.S.S.G. § 2J1.2(b)(1)(B). Consequently, all five counts constitute a single group.

The offense level for the group is the offense level for the count with the highest offense level, which is Count 4. Therefore, the combined offense level for these offenses is 25 prior to any adjustment for acceptance of responsibility.

1. *Connell's Guidelines Calculation*

The U.S. Probation Office calculated Connell's criminal history as Category II, which is not disputed. Connell PSR ¶78. In light of Connell's agreement to proceed with a stipulated trial in which he agreed to all of his conduct underlying each element of every charge he faced, Connell qualifies for a two-point reduction of his offense score for acceptance of responsibility under Section 3E1.1(a). Likewise, the government submits that a third-point reduction is appropriate under Section 3E1.1(b). As a result, Connell's final offense level is 22 with a corresponding Guidelines range of 46-57 months' imprisonment.

2. *Adams's Guidelines Calculation*[3]

The U.S. Probation Office calculated Adams' criminal history as Category I, which is not disputed. Adams PSR ¶ 76. A two-level increase in Adams' offense level pursuant to U.S.S.G. § 3C1.1 is warranted, as is a three-level reduction pursuant to § 3E1.1 for acceptance of responsibility. Adams made early efforts to obstruct the investigation and prosecution of this case before he was arrested. During a time when there was substantial news coverage of the events of

[3] The government relies on its briefing of the application of U.S.S.G. § 3C1.1 and § 3E1.1 to Adams in the government's original sentencing memorandum. ECF 110 at 23-26. Nevertheless, for completeness, the government briefly addresses the application of the guidelines again here.

January 6, Adams destroyed evidence by throwing his phone in a lake near his house, deleting his Facebook account, and repeatedly lying to interviewing FBI agents after his arrest. *See* ECF 110 at 24. By destroying his phone, attempting to destroy records from his Facebook account, and lying to the FBI, Adams "willfully obstructed or impeded, or attempted to obstruct or impede, the administration of justice with respect to the investigation, prosecution, or sentencing of the instant offense[s] of conviction." U.S.S.G. § 3C1.1. Therefore, a two-level increase is warranted. Yielding a Guidelines score of 27 for Adams before any reduction for acceptance of responsibility.

Section 3E1.1(a) provides a two-level decrease in offense level "[i]f the defendant clearly demonstrates acceptance of responsibility for his offense." Similarly, Section 3E1.1(b) provides for an additional one-level reduction in offense level in certain circumstances applicable here. In determining whether to apply the adjustment, a court should consider whether the defendant "truthfully admitt[ed] the conduct comprising the offense(s) of conviction, and truthfully admit[ed] or [did] not falsely deny[ ] any additional relevant conduct for which the defendant is accountable under § 1B1.3"—which includes "all acts and omissions committed, aided, abetted, counseled, commanded, induced, procured, or willfully caused by the defendant" and all harm caused by those acts or omissions or was the object of those acts or omissions. U.S.S.G. §§ 1B1.3(a)(1)(A), 3E1.1 cmt. n.1(A). Admitting by way of stipulated trial all the conduct comprising the offenses and not falsely denying any additional relevant conduct "constitute[s] significant evidence of acceptance of responsibility for the purposes of subsection (a)." U.S.S.G. § 3E1.1 cmt. n.3.

Conduct resulting in an obstruction of justice adjustment can co-exist with acceptance of responsibility "in extraordinary cases." U.S.S.G. § 3E1.1 cmt n.4. Adams' case is an "extraordinary case" where both obstruction and acceptance of responsibility adjustments should apply. "In evaluating whether [a defendant's] case was an 'extraordinary' one, [the court] must

look at the relationship between his obstructive conduct and his acceptance of responsibility." *United States v. Gregory*, 315 F.3d 637, 640 (6th Cir. 2003). Where the obstructive conduct pre-dated the acceptance of responsibility, the acceptance adjustment may apply. *See id.*; *United States v. Hopper*, 27 F.3d 378, 383 (9th Cir. 1994). Here, the obstructive conduct all predates Adams's agreement to a stipulated trial, and Adams admitted to the conduct that provides the basis for the obstruction of justice enhancement during a debriefing. Adams also has largely cooperated with the government's investigation after his initial omissions, minimizations, and lies.

Ultimately, then, Adams faces an offense score of 24 with a Guidelines range of 51-63 months' imprisonment.

Alternative Scenario

In the theoretical scenario where these defendants were not, and could not have been, convicted under § 1512(c), and could not have even intended to violate the statute, the defendants' guidelines calculations would change.

- In calculating the guidelines for Count Four, § 2X1.1(a) would still apply. Connell and Adams violated § 1752(a)(1) with the intent to commit the conduct charged in Count One, civil disorder in violation of § 231. Thus, the calculations discussed above for Count One would apply, and the offense level for Count Four would be 20.
- The highest offense level of the four counts would be 20, so the combined offense level for these offenses would be 20 prior to any adjustment for acceptance of responsibility.
- Applying the adjustments for acceptance of responsibility discussed above, Connell's offense level would be 17, and his guidelines range would be 27-33 months. Adams's offense level would be 19, and his guidelines range would be 30-37 months.

In this scenario, an upward variance would be appropriate under the § 3553(a) factors. As

an example, in *United States v. Fonticoba*, 21-cr-368 (TJK), Judge Kelly sentenced the defendant to 48 months' imprisonment in a case involving § 1512 and § 231 convictions, a small downward variance from the guidelines range. Sent'g Tr. 1/11/24 at 66. Judge Kelly made clear that, if the defendant's § 1512 conviction were invalidated and only a § 231 conviction remained, he would give a significant upward variance to account for the severity of the defendant's conduct. *Id.* at 66-67 ("the evidence here of the intent […] to obstruct the proceeding and the nature of the proceeding itself is so important and so critical in terms of deterrence"). This Court should do the same in light of the severity of the defendants' actions on the Northwest Stairs and the direct consequences those actions had on January 6 becoming what it was. *See* ECF 110 at 27-29. Connell and Adams were at the head of a column of thousands of rioters who were being held on the Northwest Stairs by a small group of officers. By rallying this crowd to assault the officers and finish the drive up the steps, Connell and Adams opened the Upper West Terrace, and eventually the Capitol building itself, to the riot. The 2:13 p.m. breach of the Senate Wing Doors was a direct consequence of their charge and assault against the officers on the Northwest Stairs. That initial breach, in which Connell and Adams were an instrumental part, was what caused the Congressional proceeding to certify the Electoral College vote to be suspended.

Connell and Adam's charge against the officers on the stairs and opening the Upper West Terrace to rioters also had significant strategic implications for the police officers who were in the West Plaza trying to defendant the Capitol. Taking the position on the Upper West Terrace allowed the rioters to gain a three-hundred and sixty-degree, elevated position over the police officers in the West Plaza. The officers in the West Plaza now had to contend with a crowd of thousands directly in front of them, as well as a rapidly swelling crowd above them, behind them, and flanking them. Because of Connell and Adams' actions, the police line in the West Plaza, which had held

for nearly an hour against the rioters, fell exactly twenty minutes after they led the charge up the Northwest Stairs. With the police line overrun, rioters quickly took control of much of the West Front of the Capitol against the outnumbered officers. Having seized control of much of the West Front, rioters were able to breach new areas of the Capitol and—for nearly four hours—violently resist the efforts of police officers to both clear them from the building and prevent them from breaching new areas. All of this can be traced back to the moment that Adams yelled "Let's go!" on the Northwest Stairs at 2:08 p.m. and charged against the officers on the landing with Connell following close behind.

CONCLUSION

For the reasons discussed in this memo and in the government's initial sentencing memo, a sentence of 51 months' imprisonment is appropriate for both Connell and Adams under any circumstance.

Respectfully submitted,

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