

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

|                               |   |                        |
|-------------------------------|---|------------------------|
| THE UNITED STATES OF AMERICA. | ) |                        |
| Plaintiff,                    | ) |                        |
|                               | ) |                        |
| vs.                           | ) | CASE NO: 1:21-cr-00034 |
|                               | ) |                        |
|                               | ) |                        |
| THOMAS ROBERTSON              | ) |                        |
| Defendant.                    | ) |                        |

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**DEFENDANT’S MOTION FOR  
A RECOMMENDATION TO A SPECIFIC BUREAU OF PRISONS DESIGNATION**

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Defendant Thomas Robertson, by Undersigned counsel, respectfully requests that the Court recommend to the Bureau of Prisons (BOP) that Mr. Robertson be placed at Petersburg Low FCI to serve his prison sentence. The Defense believes that Petersburg Low FCI best suits his age and military background.

On August 11, 2022, The Court sentenced Mr. Robertson to an 87-month prison sentence. Mr. Robertson is currently detained at Central Virginia Regional Jail. Undersigned and Mr. Robertson believe that the facility, Petersburg Low FCI, located at 1100 River Road Hopewell, VA 23860, best suits his needs given his age and military background. Furthermore, this facility is 3 hours away from his where his wife currently lives. Upon research and investigation, the Defense believes the FCI in Petersburg, Virginia, best suits his needs.

Mr. Robertson and his counsel understand that the BOP, and not the Court, will ultimately determine where Mr. Robertson ultimately serves his sentence. The Defense request a recommendation to the BOP because the Defense believes that Mr. Robertson would benefit

from imprisonment at this FPI location given that his sentence is less than 10 years and should be eligible for low security institution.

WHEREFORE, Defendant respectfully prays that the Court recommends to the Bureau of Prisons that the Defendant be placed in the Petersburg Low FCI , and for such further relief as is appropriate under the circumstances.

Respectfully submitted,

**Rollins and Chan Law Firm**

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Mark M. Rollins  
419 7<sup>th</sup> Street, NW  
Suite 405  
Washington, DC 20004  
Cell: 202-455-5002  
Phone: 202-455-5610  
Mark@rollinsandchan.com  
*Counsel for Defendant, Mr. Robertson*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on August 12, 2022, the foregoing document was filed electronically. Notice of this filing will be delivered to the following parties by operating the Court's electronic filing system. Parties may access this filing through the Court's system.

*/s/*

Mark Rollins