

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-cr-55 (EGS)
	:	
DOMINICK MADDEN,	:	
	:	
Defendant.	:	

**GOVERNMENT’S NOTICE OF RECENT AUTHORITY RELEVANT
TO ITS SENTENCING POSITION**

The government respectfully files this notice to alert the Court and counsel of a recent decision in this district relevant to the government’s sentencing recommendation. In *United States v. James Leslie Little*, 21-cr-315 (RCL), Judge Lamberth sentenced Little to a split sentence that includes sixty days’ imprisonment and thirty-six months’ probation. Judge Lamberth issued a memorandum opinion elaborating on the court’s reasoning as to why a split sentence is permissible, attached to this notice as **Exhibit A**. *Little*, ECF No. 43 (D.D.C. March 14, 2022). Judge Lamberth’s reasoning supports the government’s arguments at pages 21–30 of its sentencing memorandum.

In *United States v. Jeffrey Alexander Smith*, 21-cr-290 (RBW), Judge Walton agreed with Judge Lamberth’s reasoning and sentenced Smith to a split sentence that includes 90 days’ incarceration and two years’ probation on the record on March 15, 2022.

Respectfully submitted,

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By:

/s/Amanda Jawad
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CERTIFICATION OF SERVICE

I hereby certify that on March 16, 2022, I caused a copy of the foregoing notice to be served on counsel of record via electronic filing.

/s/Amanda Jawad
Amanda Jawad