

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	1:21-CR-422-APM
	§	
SEAN DAVID WATSON,	§	
<i>Defendant.</i>	§	

Government’s Sentencing Memorandum

Evaluating the sentencing factors of 18 U.S.C. § 3553(a), Sean David Watson asks this Court to sentence him to a term of probation with conditions no more onerous than home detention.

Watson recognizes the mistakes he made in January 2021. Since then, Watson has lived a quiet, austere life—building a small business out of his home and spending time with his church community and family. Before the 2020 presidential election, Watson was employed as a medical technologist. He was politically active, posting signs at his home and attending protests. Because of his conduct at the Capitol, Watson lost his job and had his first contact with the criminal justice system.

Since this case began, Watson has realized that he erred, not only by his actions at the Capitol but also in his thinking that led to it. Watson now looks back on that time and wonders how he got so caught up in political passions that he was inspired to join a mob that turned violent. He has discontinued his political activism. His house now shows his skills as a horticulturist and dedication to building a business using those skills. The only remaining banners are religious.



The government asks the court to impose a sentence of probation that includes 14 days of custody. Watson respectfully asks the Court to deny the government’s request for custody. Watson served two days at the outset of this case; he was arrested on a Wednesday and did not appear before a federal magistrate until that Friday. Watson has been very successful on pretrial release. He lives in a small town and doesn’t do much more than work, go to church, and spend time with his family.

Watson entered the Capitol through doors that had been breached 34 minutes prior to his entry. Watson’s time in the Capitol was only 35 minutes. His time in the District was otherwise unremarkable.¹

A probationary sentence is appropriate in this case. Watson has shown his ability to comply with conditions of release. He essentially has been living on voluntary home detention since this case began. He asks the Court to permit him to continue building his business while on probation.

Respectfully submitted,
/s/ Shane O’Neal
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¹ Watson was briefly detained for crossing a police line on his way to his hotel on January 5, but officers declined to pursue that charge.

CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of September 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

AUSA Graciela Lindberg

/S/ Shane O'Neal
SHANE O'NEAL
Attorney for Defendant