

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	Case No. 21-cr-00290 (RBW)
v.	:	
	:	
JEFFREY ALEXANDER SMITH,	:	
	:	
Defendant.	:	

**GOVERNMENT’S NOTICE OF SUPPLEMENTAL AUTHORITY RELATED TO
SUPPLEMENTAL SENTENCING MEMORANDUM ADDRESSING SENTENCES
THAT INCLUDE INCARCERATION AND PROBATION**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully submits the attached opinion by Judge Royce C. Lamberth dated March 14, 2022, in United States v. James Little, 21-cr-315 (RCL), that supports imposition of a split sentence for petty offenses and the arguments of the United States in the Government’s Supplemental Sentencing Memorandum (ECF Doc. 42).

Respectfully submitted,

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UNITED STATES ATTORNEY

By:

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