

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

|                           |   |                         |
|---------------------------|---|-------------------------|
|                           | ) |                         |
| UNITED STATES OF AMERICA, | ) |                         |
|                           | ) | Case No. 1:21-cr-85-CRC |
|                           | ) |                         |
| v.                        | ) |                         |
|                           | ) |                         |
| JOHN H. STRAND,           | ) |                         |
|                           | ) |                         |
| Defendant.                | ) |                         |
|                           | ) |                         |

**STRAND’S MOTION TO AMEND PRESENTENCE REPORT**

Defendant Strand, by counsel, moves the Court to amend his Presentence Report (PSR) for the reasons that follow.

On June 1, 2023, the Court sentenced Strand to 32 months’ incarceration. As the Court will recall, the Probation Office did not conduct an interview of the defendant before it compiled the PSR. Thus, Strand’s substance abuse history was not noted in the report. At the time of Strand’s arrest in January 2021 he had developed a habit of consuming four to five alcoholic beverages a night almost every day of the week. Strand abused alcohol to cope with anxiety and depression. His addiction continued untreated after his arrest.

Strand would like to get help for his addiction while incarcerated. It will be harder for him to do so with a PSR that does not address medical issues. Beyond alcoholism, Strand has two medical conditions that are not reflected in the PSR: vasovagal syncope and plantar fasciitis. Before filing this motion, Strand’s counsel requested that the Probation Office amend the PSR to reflect these facts. The office responded that Strand would first need to secure Court approval. For all these reasons Strand respectfully requests that the Court authorize the Probation Office to conduct a brief follow-up interview with Strand so that these medical facts may be included in an amended PSR.

Dated: June 12, 2023

Respectfully submitted,

/s/ Nicholas D. Smith

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**Certificate of Service**

I hereby certify that on the 12th day of June, 2023, I filed the foregoing motion with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following CM/ECF user(s): Counsel of record.

And I hereby certify that I have mailed the document by United States mail, first class postage prepaid, to the following non-CM/ECF participant(s), addressed as follows: [none].

/s/ Nicholas D. Smith

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