

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

KEVIN SEEFRIED,

Defendant.

Crim. Action No. 1:21CR287

KEVIN SEEFRIED'S OBJECTIONS TO THE GUIDELINES CALCULATION

Pursuant to 18 U.S.C. § 3553(a), Rule 32 of the Federal Rules of Criminal Procedure, and Section 6A1.3 of the advisory United States Sentencing Guidelines (“USSG”), Mr. Seefried, through counsel, states that he has reviewed the Pre-Sentence Report and offers the following objections: First, he respectfully submits that he should receive an adjustment for acceptance of responsibility under § 3E1.1 because this is a rare situation in which Mr. Seefried has demonstrated his acceptance of responsibility despite having exercised his constitutional right to a trial. Second, for the reasons this Court articulated in Mr. Seefried’s son’s case, *United States v. Hunter Seefried*¹, the PSR wrongly assesses a total 11-level increase under § 2J1.2 because Mr. Seefried’s conduct did not involve the substantial interference with the “administration of justice.”

¹ See Memorandum Opinion re: Sentencing Enhancements, ECF. No. 123.

Undersigned counsel will expand upon these objections in Mr. Seefried's Memorandum in Aid of Sentencing, currently due on February 2, 2023.

Respectfully Submitted,

A.J. KRAMER

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by: _____s/ _____

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