

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

Case No. 21-cr-381 TSC

STACY HAGER

**ADDENDUM TO
DEFENDANT'S MEMORANDUM IN AID OF SENTENCING**

Comes now the defendant, by and through his attorney, Richard S. Stern, to respectfully add to his sentencing memorandum, ECF 61, two matters.

As grounds therefore, we state as follows:

1. We have attached three pictures taken at essentially the same time and place as the government's exhibit figure 1 on page 2 of their sentencing memorandum, ECF 58.
2. We note these pictures do not show any inappropriate gestures, unlike the government's figure.
3. We also wish to withdraw our objections as to guidelines in paragraphs 22 and 23 of the final Presentence Report, ECF 59, but we will still seek a variance.

Respectfully submitted,

/s/ Richard S. Stern

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have electronically served all counsel of record on July 12, 2023.

/s/ Richard S. Stern

RICHARD S. STERN