

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

21-Cr-474-(3) BAH

DAWN MUNN

SENTENCING MEMORANDUM FOR DAWN MUNN

Pursuant to 18 USC § 3553(a), the Court shall impose a sentence sufficient, but not greater than necessary, to reflect the seriousness of the offense; to promote respect for the law and to provide just punishment for the offense; to afford adequate deterrence; to protect the public from further crimes of the defendant; and to provide the defendant with needed educational/vocational training, medical care, or other correctional treatment.

For these reasons the defendant requests this Honorable Court accept the Sentencing Recommendation of the United States Office of Probation and impose a sentence of 24 months' probation and a payment of \$500.00 restitution, with 50 hours of community service. This is proportionate to the sentences imposed on other similarly situated "minor" actors and reasonably represents the culpability and criminality of the defendant.

The mission of the United States Office of Probation is to evaluate each individual defendant and his or her personal characteristics in light of the charged criminal conduct and to recommend to the Court an appropriate sentence. The United States Office of Probation applies its considerable knowledge and experience to adopt a just recommendation pursuant to 18 USC §3553(a) to the Court. The Office of Probation has recommended a non-custodial sentence.

P.O. Crystal Lustig has extensive experience in evaluating the conduct of January 6th defendants facing Sentence before this Court for their participation in the events of January 6,th 2021. Collectively the Office has had the responsibility to weigh the particular conduct of over 250 defendants, in light of his or her personal history and characteristics.

Specifically, as to Dawn Munn, P.O. Lustig recommends a term of 24 months' probation as sufficient to address the goals of sentencing. She states, "[w]ith respect to deterrence, community safety and punishment, Mrs. Munn has been in compliance with her pretrial supervision and her terms of release. She does not appear to present a danger to the community and goals of sentencing may be accomplished through a non-custodial sentence of probation supervision."

This is Mrs. Munn's only criminal contact in her otherwise unblemished life. She is fifty-seven years old. She was cooperative when approached by FBI. She has been in total compliance with Pre Trial-Supervision since her release on July 14th, 2021. She has been under PTS supervision for fifteen months. She has accepted responsibility for her conduct and she entered a guilty plea on May 13, 2022.

Mrs. Munn is the sole support of her family. She has been married to Thomas Munn since 1988. They have eight children. He is a stay at home father and takes responsibility for home schooling the minor children and grandchildren. It is noteworthy that while inside the Capitol, Mrs. Munn is seen on video, along with other family members, picking up trash that other protesters had tossed on the floor. She remained peaceful and followed police instruction directing her to leave the building.

Mrs. Munn has been a model citizen. She has shown great responsibility throughout her life. She had travelled to Washington to attend a "peaceful protest". She now has great remorse for allowing herself to get caught up in the traumatic chaos that ensued. She deeply regrets having entered the U.S. Capitol building. She deeply regrets misunderstanding the concept of electoral votes or what was to transpire in the Capitol that day. Mrs. Munn abhors violence and is still shocked and dismayed, after learning the extent of the violence that occurred. She is very remorseful and regrets having entered and protested inside the Capitol building, on January 6th, 2021. She offers "her sincerest apology to the Court, to the injured law enforcement officers, to the terrified members of congress and their staffs and to our countrymen.

On behalf of Dawn Munn we request the Court adopt the recommendation of P.O. Lustig. A non-custodial sentence involving a period of probation and restitution is a just sentence.

Respectfully submitted,

_____/s_____
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