

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

JORDEN ROBERT MINK

Defendant.

Case No. 21-CR-25 (RDM)

**GOVERNMENT'S RESPONSE TO DEFENDANT'S MOTION FOR VARIANCE OR
DOWNWARD DEPARTURE**

The United States submits this brief response to defendant's [REDACTED] filing, which requests a downward departure or variance based on defendant's records. The government respectfully disagrees. The government notes that [REDACTED], and their probative value of the defendant's [REDACTED] is questionable. [REDACTED] further suggest that defendant received [REDACTED], and, despite that [REDACTED], has not used his time in the community [REDACTED], which he was [REDACTED] [REDACTED]. While the defendant compares himself to a [REDACTED] [REDACTED]. In summary [REDACTED] [REDACTED] the defendant [REDACTED] on January 6 when he violently attacked officers, smashed a window of the Capitol building, and stole property. For the reasons set forth above, the government submits that a downward departure is not warranted.

Respectfully submitted,

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