

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

22-cr-233-01 ABJ

KEVIN M. CRONIN

MEMORANDUM IN SUPPORT OF SENTENCE

Kevin Cronin is a good human being. He is a law-abiding member of his community and has long been devoted to human rights. In the military he trained as a mediator to resolve Employment Opportunity and Equal Employment Opportunity disputes. He volunteered with Habitat for Humanity. He also participated in trainings to serve as a facilitator for victims of sexual assault. Since his retirement from the army, he has been employed at the United States Post Office. As a postal worker, he served his co-workers as a union representative. This is a man who cares deeply about his country, his fellow citizens and his beloved family.

On April 12, 2023, Kevin Cronin will stand before the Court with enormous remorse and great humility. He deeply regrets coming to Washington on January 6th, 2021. Upon appointment of counsel, he requested I tell the United States Attorney he was ready to be held accountable. I notified the Government of his desire to accept responsibility for his conduct, and he entered an early plea to Count 6 to the charge of

Parading, Demonstrating or Picketing in a Capitol Building in violation of Title 40 USC § 5104(e)(2)(G).

Kevin accepts there will be consequences for his unlawful actions on January 6th, 2021. He trusts that the Court will consider the history of this very good man and his lifetime of public service in imposing an appropriate and just sentence.

Kevin was arrested June 13, 2022. Since his release he has been in full compliance with Pretrial Services. He is a lifetime public servant who served twenty-six years in the military, first as a member of the marine corps and then in the U.S. Army. He is currently employed by the United States Postal Service.

Kevin Cronin drafted a biography for the Court in the hope that you view his offense conduct on one day, January 6, 2021, in the context of the 9,490 days when he served his country as a proud member of the Armed Forces throughout the world. As Bryon Stevenson states in Just Mercy, "[d]on't judge a man by the worst thing he has ever done."

Kevin did not come to Washington to do harm. He acknowledges he made a grave mistake in following the entreaty of then President Trump to walk from the Ellipse to the Capitol with his sons. He is ashamed and humiliated that he entered the Capitol grounds at all.

In his defense, he used neither force nor violence. He did not come to Washington with weapons or bear spray, or anything meant to do harm. Kevin Cronin's culpability appears to be minimal in contrast with rioters who

destroyed or stole government property and/or those who assaulted or threatened law enforcement officers on that date.

He came in peace and truly wishes he had left from the Ellipse after the speeches and never entered the Capitol grounds. Though he remained inside for only five minutes, he recognized the wrongfulness of his entry almost immediately. He accepts full responsibility for his actions. Every day he regrets that he and his sons did not leave from the Ellipse, before they walked down the avenue and unlawfully entered the Capitol.

He no longer relies on Fox News for his information. He now pursues information in the mainstream news and has no interest in social media. He is very concerned that his decision to bring his sons to watch the President speak and the horror that followed at the Capitol will limit their opportunities and impact their futures. He blames himself for placing his sons' futures in jeopardy. He accepts full responsibility for his actions. He understands that actions have consequences.

We adopt the recommendation of United States Probation for a period of probation and payment of restitution. In light of his lifetime in public service, his good citizenship, and his devotion to his family we are requesting Probation and \$500.00 restitution to be paid immediately. Mr. Cronin has the ability to pay a fine .He has the ability to perform Community Service.

He is an excellent candidate for Probation.

Respectfully submitted,

_____/s_____

Heather Shaner #273276
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