

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA
(CRIMINAL MATTER)

UNITED STATES OF AMERICA)	
)	
)	
v.)	Docket No.: 22cr41-APM
)	
)	
PAUL SEYMOUR SR.)	
Defendant)	

DEFENDANT’S POSITION WITH RESPECT TO SENTENCING

COMES NOW the Defendant, PAUL SEYMOUR SR., by and through counsel, Dwight E. Crawley, and respectfully requests that this Court sentence the defendant to probation for a term of 12 months, \$500.00 restitution and 60 hours community service. Mr. Seymour Sr. timely accepted responsibility for his conduct in this matter. He did not force the government to expend enormous resources prosecuting this case at trial.

Mr. Seymour Sr. voluntarily met with FBI agents concerning this matter. He acknowledged his role and expressed remorse for his actions. Mr. Seymour did not minimize his role in the offense. Moreover, his conduct, although illegal, did not involve the use of force or violence. He did not break any windows or cause damage to any buildings. Accordingly, his conduct should not be viewed in the same light as others.

Mr. Seymour Sr. deeply regrets the harm this matter has caused the country. He recognizes that he will forever be linked to this crime as a search of his name via the internet clearly reveals. Probation for a term of 12 months, \$500.00 restitution and 60 hours community service is appropriate in this case. It does not create unwarranted disparity between others convicted of the same crime. It punishes him for his conduct while promoting respect for the law. It deters futures

criminal conduct by demonstrating similar behavior will not go unpunished.

Finally, Mr. Seymour Sr. enjoys a very modest lifestyle. He is retired and receives social security benefits as his primary source of income. He currently resides with his girlfriend and does not have the ability to pay a fine.

Respectfully submitted

PAUL SEYMOUR SR.

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of October 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all attorneys of record.

/s/

Dwight E. Crawley