

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :  
 :  
 v. : Criminal No. 22-cr-184 (DLF)  
 :  
 BARRY BENNET RAMEY, :  
 :  
 Defendant. :

**NOTICE OF SUPPLEMENTAL AUTHORITY**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, hereby files this notice of supplemental authority. Attached to this filing is a transcript of the May 5, 2023, sentencing in *United States v. Schwartz, et al.*, 21-cr-178 (APM), wherein Judge Mehta found that two defendants used pepper spray as a dangerous weapon under the U.S. Sentencing Guidelines where defendants sprayed officers directly in the face, “consistent with intent to commit bodily harm.” 21-cr-178, 05/05/2023 Tr. at 10-11.

Respectfully submitted,

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By: /s/  
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