

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

vs.

CRIMINAL NO. 1:21-CR-733(CRC)

JEREMY BAUCHE

February 15, 2023

DEFENDANT'S MEMORANDUM IN AID OF SENTENCING

Counsel for the defendant files this brief supplemental sentencing memorandum to alert the Court to two factual issues in anticipation of the February 15, 2023 sentencing in this matter.

1. On page 10 (first sentence of bottom paragraph) of the Government's Sentencing Memorandum, the government contends that Mr. Baouche "researched information about the Capitol Building layout a month prior to coming to Washington." The defense respectfully disagrees with this characterization. It has reviewed Mr. Baouche's workplace search history and it sees no searches of this nature occurring prior to January 6, 2021. Mr Baouche performed these searches on January 7, concedes it was because he had been there, and would be consciousness of guilt evidence. He does not, however, recall searching for the building's layout prior to January 6, 2021 and the document reviewed by the defense seems to suggest these searches post-dated January 6.
2. Mr. Baouche paid his restitution and assessment on February 10, 2023. Counsel has submitted the Pay.gov receipt to probation and the government.

Respectfully Submitted,

/s/Daniel M. Erwin/s/

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CERTIFICATION OF SERVICE

This is to certify that on February 15, 2023, a copy of the forgoing was filed electronically via the Court's CM/ECF system, and by that system, counsel for the Government has been provided with a copy of the forgoing.

/s/Daniel M. Erwin/s/

Daniel M. Erwin