**IN THE UNITED STATES DISTRICT COURT**

**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA : CRIMINAL NO. 17-CR-0002**

**V. : DATE FILED: 10/8/17**

**MATTHEW JEFFERSON : VIOLATION:**

**8U.S.C. § 1326(a)**

**: (reentry after deportation - 1 count)**

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

On or about July 28, 2021, in the Eastern District of Pennsylvania, defendant

**MATTHEW JEFFERSON**

an alien, and native and citizen of Mexico, who had previously been deported and removed from the United States on or about March 17, 2015, was found in the United States, having knowingly and unlawfully reentered the United States without first applying to the Attorney General of the United States or his successor, the Secretary for Homeland Security (Title 6, United States Code, Sections 202(3), (4) and 557), for permission to reapply for admission, and without receiving in response the express consent of the Attorney General or his successor to reapply for admission.

In violation of Title 8, United States Code, Section 1326(a).

A TRUE BILL:

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

FOREPERSON

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

United States Attorney

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

INDICTMENT

DESIGNATION FORM to be used by counsel to indicate the category of the case for the

purpose of assignment to appropriate calendar.

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Address of Plaintiff: 710 Walnut Street, Suite 1308, Philadelphia, PA 19106-4476

Post Office: Philadelphia County: Philadelphia

City and State of Defendant: Coatesville, PA

County: Chester County Register number: N/A

Place of accident, incident, or transaction: Eastern District of Pennsylvania

Post Office: West Chester County: Chester County

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RELATED CASE, IF ANY:

Criminal cases are deemed related when the answer to the following question is "yes".

Does this case involve a defendant or defendants alleged to have participated in the same

action or transaction, or in the same series of acts or transactions, constituting an offense

or offenses?

YES/NO: No

Case Number: N/A Judge: N/A

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CRIMINAL: (Criminal Category - FOR USE BY U.S. ATTORNEY ONLY)

1. Antitrust

2. Income Tax and other Tax Prosecutions

3. Commercial Mail Fraud

4. Controlled Substances

5. Violations of 18 U.S.C. Chapters 95 and 96 (Sections 1951-55 and 1961-68)

and Mail Fraud other than commercial

6. General Criminal

(U.S. ATTORNEY WILL PLEASE DESIGNATE PARTICULAR CRIME AND

STATUTE CHARGED TO BE VIOLATED AND STATE ANY PREVIOUS

CRIMINAL NUMBER FOR SPEEDY TRIAL ACT TRACKING PURPOSES)

Re-entry After Deportation, 8 U.S.C. 1326(a)

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

DATE: 10/8/17 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

United States Attorney

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA )**

**)**

**)**

**vs. ) PRESENTENCE INVESTIGATION REPORT**

**)**

**) Docket No.: 22-CR-0002**

**Matthew Jefferson )**

**Prepared for:** The Honorable Mark A. Kearney

U.S. District Court Judge

**Sentence Date:** August 11, 2022, 10:30 AM

**Offense:** **Count 1**:

Reentry after deportation

8 U.S.C. § 1326(a)

Not more than 2 years of imprisonment/$250,000 fine

(Class E felony)

**Release Status:** Chester County Police arrested the defendant and placed him in Chester

County custody on October 2, 2021. They transferred him to state custody on November 5, 2021. The defendant received parole to move to an Immigrations and Customs Enforcement (ICE) detainer on January 19, 2022 and was placed in federal custody on May 8, 2022.

**Detainers:** Immigration and Customs Enforcement

**Date Report Prepared:** June 20, 2021 **Date Report Revised:** July 8, 2021

**PART A. THE OFFENSE**

**Charge and Conviction**

1. On February 15, 2022, a grand jury sitting in the Eastern District of Pennsylvania

returned a one-count Indictment charging Matthew Jefferson with reentry after

deportation, in violation of 8 U.S.C. §1326(a).

1. On January 4, 2022, the defendant appeared before the Honorable Mark. A. Kearney and

entered a plea of guilty to the Indictment.

**Plea Agreement**

1. The defendant agrees to plead guilty to the Count One of the indictment arising from

reentering the United States. The defendant acknowledges his waiver of rights, as

set forth in the attachment to this agreement.

1. The defendant agrees to pay a fine as directed by the Court at sentencing.
2. The defendant agrees to pay the special victims/witness assessment in the amount of

$100 at such time as directed by the Court.

1. The parties agree and stipulate the defendant’s base offense level is 8. USSG §2L1.2(a).
2. Under USSG §2L1.2(b)(3)(A), the parties agree and stipulate the defendant’s offense level increases 10 levels based on a 2016 two-count delivery of cocaine conviction, in violation of 35 Pa. C.S.A. § 780-113(a)(30), in the Chester County Court of Common Pleas for which the defendant received a sentence totaling 30 to 60 months’ imprisonment.
3. The parties agree and stipulate, as of the date of this agreement, the defendant has

demonstrated acceptance of responsibility for his offense making the defendant eligible

for a 2-level downward adjustment under USSG §3E1.1(a).

1. The parties agree and stipulate, as of the date of this agreement, the defendant has

assisted authorities in the investigation or prosecution of his own misconduct by timely

notifying the government of his intent to plead guilty, thereby permitting the government

to avoid preparing for trial and permitting the government and the court to allocate their

resources efficiently, resulting in a 1-level downward adjustment under USSG §3E1.1(b).

1. The parties agree and stipulate due to the authorized Early Disposition Program in this district under USSG § 5K3.1, the defendant is eligible for a 2-level downward departure.
2. The parties have no agreement as to the defendant’s Criminal History Category. This agreement is conditioned on the defendant having less than 13 criminal history points. If the defendant has 13 or more criminal history points, or if the government discovers a conviction other than those disclosed to the defense before sentencing, the government shall have the right to withdraw from this agreement.

**Applicable Guidelines**

1. The offenses occurred on July 2, 2021. The Sentencing Reform Act of 1984 is applicable. The edition of the Sentencing Guidelines Manual used to calculate the guideline in the report incorporates amendments effective November 1, 2014, as there are ex post facto issues. Use of the 2016 Guidelines Manuel would have produced a more onerous total offense level.[[1]](#footnote-1)

**Pretrial Adjustment**

1. Chester County Police arrested the defendant and placed him in Chester County custody on July 2, 2021. They transferred him to state custody on November 5, 2021. The defendant moved to an Immigrations and Customs Enforcement (ICE) detainer on January 19, 2022 and placed in federal custody on May 8, 2022.
2. As of the writing of this report, the defendant has not incurred any disciplinary

infractions while in custody.

**The Offense Conduct**

1. The Department of Homeland Security (DHS) reported the defendant Matthew Jefferson is a native and citizen of Mexico with one previous removal from the United States.

Previous Removal

1. The defendant first entered the United States on an unknown date and location without

inspection or authorization[[2]](#footnote-2). On June 20, 2019, the defendant encountered U.S.

Border Patrol in the District of Arizona. On March 16, 2021, he received a “Notice and

Order of Expedited Removal” (Form I-860). U.S. Border Patrol removed the defendant from the United States via Port of Entry in Calexico, California, on June 24, 2021.

Instant Offense

1. Chester County Police arrested the defendant on July 2, 2016, for delivering cocaine to a confidential informant on three separate occasions in Chester County, Pennsylvania. On April 6, 2017, the defendant pled guilty to two counts of possession with intent to deliver cocaine and received a sentence of 2.5 to 5 years’ imprisonment in the Court of Common Pleas of Chester County.
2. On March 11, 2021, the defendant encountered Immigrations and Customs Enforcement (ICE) at State Correctional Institute Camp Hill where he served his state sentence. An immigration detainer was lodged with the facility due to the defendant’s unlawful status in the United States and previous removal on June 24, 2016. On January 19, 2022, the defendant moved into ICE custody and moved to the York County Prison for the instant offense. On May 8, 2022, the defendant entered federal custody.

**Victim Impact**

1. There are no identifiable victims in this offense.

**Adjustment for Obstruction of Justice**

1. The probation officer has no information indicating the defendant impeded or obstructed justice.

**Adjustment for Acceptance of Responsibility**

1. The defendant admitted his participation in the instant offense at the guilty plea hearing

and meets the minimum requirements for acceptance of responsibility.

Under USSG §3E1.1(a), he is eligible for a two-level decrease in the offense level.

As verified by the government in the plea agreement, the defendant assisted the

government by providing timely notification of his intent to plead guilty. He is

eligible for an additional one-level decrease, under USSG §3E1.1(b).

1. On advice of counsel, the defendant did not discuss any other details about the instant offense.

**Offense Level Computation**

1. Since use of the manual in effect at the time of sentencing would violate the ex post facto

clause of the Constitution, the 2014 Guidelines Manual is used. USSG §1B1.11(a).

**Count 1: Reentry after deportation**

1. **Base Offense Level:** The guideline for a violation of 8 U.S.C. § 1326(a) is USSG

§2L1.2. The base offense level is 8. USSG §2L1.2(a). **8**

1. **Specific Offense Characteristics:** None. **0**
2. **Victim Related Adjustment:** None. **0**
3. **Adjustment for Role in the Offense:** None. **0**
4. **Adjustment for Obstruction of Justice:** None. **0**
5. **Adjusted Offense Level (Subtotal):** **8**
6. **Chapter Four Enhancement:** None. **0**
7. **Acceptance of Responsibility:** The defendant has demonstrated acceptance of responsibility for the offense. The offense level is decreased by two levels. USSG §3E1.1(a).  **-2**
8. **Total Offense Level: 6**

**PART B. THE DEFENDANT’S CRIMINAL HISTORY**

**Juvenile Adjudication**

1. None.

**Adult Criminal Conviction**

**Date of Date Sentence**

**Arrest Conviction/Court Imposed/ Disposition Guideline Pts**

1. 10/28/2015 Delivery of cocaine 5/20/2016: The 4A1.1 (a) 3

(Age twenty (two counts) defendant pled guilty

seven) and was sentenced to

Chester County 2.5 to 5 years’ imprisonment.

Court of Common

Pleas, West Chester, 10/03/2017: The defendant

PA was paroled to ICE detainer.

(CP-15-CR-0004058 10/28/2020: Currently scheduled

-2015) maximum date.

The defendant delivered cocaine to a confidential informant on three separate occasions in Chester County, Pennsylvania. On September 18, 2015, the defendant delivered two bags of cocaine to a confidential informant in exchange for $290.00 in Coatesville, Pennsylvania. On October 12, 2015, the defendant delivered three bags of cocaine to a confidential informant for $280.00 in Coatesville. On October 28, 2015, the defendant delivered two bags of cocaine in exchange for $2,600.00 in East Marlborough Township, Pennsylvania.

**Criminal History Computation**

1. The criminal convictions above result in a subtotal criminal history score of 3.
2. The total criminal history score is three. The sentencing table in USSG Chapter five, Part A, a criminal history score of three established a criminal history category of II.

**Other Criminal Conduct**

1. None.

**Pending Charges**

1. None.

**Other Arrests**

1. None.

**PART C. OFFENDER CHARACTERISTICS**

1. *The probation officer interviewed the defendant on August 8, 2021, at the Federal*

*Detention Center in Philadelphia, Pennsylvania with defense counsel present. The probation officer interviewed the defendant in Spanish, with assistance of a Court-approved interpreter. Due to the defendant’s alien status, most of the information in this section could not be verified.*

**Personal and Family Data**

1. The defendant reported being born Matthew Jefferson in Mexico City, Mexico, on October 14, 1986. His parents, Mariano Jefferson (age unknown), and Robin Manriquez (age unknown), who are married and reside in Mexico City, Mexico raised him.
2. The defendant said his father owns and runs a dry-cleaning store while his mother is a hairdresser. The defendant mentioned both of his parents suffer from diabetes. He reported they are not aware of his current legal situation. “I do not want to worry them or get them involved,” he said.
3. During the presentence interview, the defendant stated he has ten siblings. He stated

four of his siblings live in the United States, while the rest of them live in Mexico close to his parents.

1. The defendant reported having a close relationship with all his siblings. He stated

his siblings who are in the United States are aware of his current legal situation, but the

ones in Mexico are not.

1. When asked about his childhood, the defendant described it as “happy.” He reported having a “tight knit” and “supportive” family. He reported he and his siblings were provided with food, clothing, and shelter. He recalled the house he grew up in to be a “modest, but a happy house.”
2. The defendant reported marrying Holly Jaramillo (age twenty-five) in a church in Mexico in 2011. He said he lived with her and their daughter Ophelia Jefferson (age three), in Coatesville, Pennsylvania, before his arrest in 2015. He advised he is in contact with his wife, but she has not been able to visit him while he has been in custody because they do not have a proper marriage license.
3. The defendant stated he has lived in Mexico City, Mexico for most of his life. During his time in the United States, he reported living in Coatesville, Pennsylvania, from 2012, until his arrest in 2015.
4. After the defendant’s deportation, he plans to move back into his parent’s residence in

Mexico City, Mexico where he hopes to become an electrician.

1. On February 22, 2018, the probation office interviewed Holly Jaramillo by telephone. She advised she has been with the defendant for about seven years and said they lived together with their daughter before his arrest. Ms. Jaramillo confirmed the information provided by the defendant. She said he worked for a flooring company in Coatesville before his arrest, though she could not recall the name of the business. Ms. Jaramillo works as a cook in an area restaurant. She works five days a week; she pays a babysitter to watch her daughter while she works.
2. Ms. Jaramillo described the defendant as “responsible and a loving husband and father.” She stated she speaks to the defendant by phone when he has the money to call. He

speaks to his daughter, though she does not stay on the phone for too long. Ms. Jaramillo has been struggling financially since the defendant’s arrest. She must pay the rent

and bills on her own in addition to childcare expenses for their daughter.

1. Ms. Jaramillo stated she and her daughter will stay in the United States after the defendant is deported. The couple plans to stay together, though they know the

distance will make it more difficult.

**Potential Re-entry Needs**

1. The defendant has never sought permission to visit, work, or live in the United States,

and he has never been admitted to the United States after inspection. He is subject to a

deportation order and will likely be removed from the United States after he serves any

term of imprisonment.

**Physical Condition**

1. The defendant is a white, Hispanic male who stands six feet, two inches tall and weighs

190 pounds. He has green eyes and black hair. The defendant has tattoos on his arms,

right hand, and chest. His daughter’s name, “Ophelia,” is tattooed on his right arm, while his wife’s name, “Holly,” is on his right hand. An image of a joker playing card is tattooed on his left arm.

1. During the presentence interview, the defendant stated he is in good health and he does not suffer from any serious or chronic health issues. The defendant reported he is not currently prescribed any medications.
2. The Bureau of Prisons has classified the defendant at the lowest level of medical care,

which is “Care Level 1” (“healthy or simple chronic care”). There are presently no

medical restrictions and he is cleared for food service. The defendant’s physical condition does not appear to present an issue for sentencing, institutional classification, or

community supervision.

**Mental and Emotional Health**

1. The defendant reported suffering from bipolar disorder. The defendant said he is not currently prescribed medication for it, but said he met with a therapist about two months before his arrest.

**Substance Abuse**

1. The defendant reported he drinks “one or two shots (of liquor) every two weeks.” He

reported he has tried cocaine, but he does not use it currently.[[3]](#footnote-3) He denied use of all other

controlled substances.

**Educational, Vocational and Special Skills**

1. The defendant reported he completed the fifth grade in Mexico and he has not

pursued any additional educational or vocational training. During the presentence

interview, he mentioned he is interested in taking English as a Second Language

(ESL) classes while incarcerated.

**Employment Record**

1. At the time of the defendant’s arrest in 2015, he reported working for a flooring company

in Coatesville.[[4]](#footnote-4) He said he has worked for the company for the past three years. He

recalled he worked “every day there was not bad weather,” and made between

$700 to $800 per week.

1. In Mexico, the defendant reported his only employment as picking and cutting avocados.

**Financial Condition: Ability to Pay**

1. The defendant has been in federal custody since May 8, 2021. He denied having

any assets or liabilities. Since he is an illegal alien, a full financial investigation,

including a credit check, could not be performed. The probation officer has not identified

any financial resources.

1. Under USSG §5E1.2(a), *“The court shall impose a fine in all cases, except where*

*the defendant establishes that he is unable to pay and is not likely to become able to pay*

*any fine.”* The defendant’s ability to pay a fine within the guideline range is negligible,

given his lack of assets, current incarceration, and pending deportation. The defendant

has been deemed indigent, he has no monthly income, and is represented by a federal

defender. He is unable to pay a fine of any amount immediately.

1. If the defendant is incarcerated, payment on a fine or restitution can commence through

the Bureau of Prisons Inmate Financial Responsibility Program (IFRP). An inmate

participating in this program will be able to contribute half of monthly prison work

earnings, for every month of imprisonment served, toward any immediately due fine or

restitution. Average yearly earnings of $300 can be expected for an inmate who is

employed in federal prison, and the Bureau of Prisons will apply up to 50% of this sum,

or a minimum of $100, to payments of fines and restitutions. Participation in the IFRP is

voluntary.

**PART D. SENTENCING OPTIONS**

**Custody**

1. **Statutory Provisions:** The maximum term of imprisonment is two years. 8 U.S.C. §

1326(a).

1. Guideline Provisions: Based upon a total offense level of 6 and a criminal history

category of II, the guideline imprisonment range is one to seven months.[[5]](#footnote-5)

**Impact of Plea Agreement**

1. As stated in the plea agreement, the government intends to move for a two-level departure

from the Sentencing Guidelines under USSG §5K3.1 and the Early Disposition

Program authorized for this district.

**Supervised Release**

1. **Statutory Provisions:** The Court may impose a term of supervised release of not more

than one year. 18 U.S.C. § 3583(b)(3).

1. **Guideline Provisions:** Since the offense is a Class E felony, the guideline range for a

term of supervised release is one year. USSG §5D1.2(a)(3).

1. Under USSG §5D1.1(c), *“The court ordinarily should not impose a term of*

*supervised release in a case in which supervised release is not required by statute and*

*the defendant is a deportable alien who likely will be deported after imprisonment.”*

**Probation**

1. **Statutory Provisions:** The defendant is eligible for not less than one nor more than five

years’ probation because the offense is a Class E Felony. 18 U.S.C. § 3561(c)(1). One of

the following must be imposed as a condition of probation unless extraordinary

circumstances exist: a fine, restitution, or community service.

1. **Guideline Provisions:** If probation is imposed, the term shall be at least one year but not

more than five years if the offense level is six or greater. USSG §5B1.2(a)(1).

1. Since the applicable guideline range is in Zone B of the Sentencing Table, the Court may

impose probation with a condition or combination of conditions requiring intermittent

confinement, community confinement, or home detention, as provided in USSG

§5C1.1(e) (Imposition of Term of Imprisonment). USSG §5B1.1(a)(2).

**Fines**

1. **Statutory Provisions**: The maximum fine is $250,000. 18 U.S.C. § 3571(b).
2. A special assessment of $100 is mandatory. 18 U.S.C. § 3013.
3. **Guideline Provisions:** The fine range for this offense is from $500 to $5,000. USSG

§§5E1.2(c)(3) and (h)(1). This figure is taken from the 2014 guidelines book.

1. Costs of prosecution shall be imposed on the defendant as required by statute. USSG

§5E1.5. In determining whether to impose a fine and the amount of such fine, the Court

shall consider, among other factors, the expected costs to the government of any term of

probation, or term of imprisonment and term of supervised release imposed. USSG

§5E1.2(d)(7) and 18 U.S.C. § 3572(a)(6). These costs may include drug and alcohol

treatment, electronic monitoring, and/or contract confinement costs. The most recent

advisory from the Administrative Office of the United States Courts from June 24, 2021,

provides the following monthly cost data:

**Bureau of** **Community Supervision by**

**Prisons Facilities Correction Centers Probation Officer**

Daily $95.00 $80.00 $12.00

Monthly$2,898.00 $2,440.00 $366.00

Annually $34,770.00 $29,280.00 $4,392.00

**Restitution**

1. **Statutory Provisions:** Restitution is not applicable in this case. 18 U.S.C. § 3663.
2. **Guideline Provisions:** Restitution is not applicable in this case.

**PART E. FACTORS THAT MAY WARRANT DEPARTURE**

1. At the time of sentencing, the government intends to move for a two-level departure from

the Sentencing Guidelines under USSG §5K3.1 and the Early Disposition Program

authorized for this district.

**PART F. FACTORS THAT MAY WARRANT A SENTENCE OUTSIDE OF THE**

**ADVISORY GUIDELINE SYSTEM**

1. The probation officer has not identified any factors warranting a variance from

the applicable sentencing guideline range.

Respectfully Submitted,

Samantha G. Popper

Chief U.S. Probation Officer

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA )**

**)**

**)**

**vs. )**

**)**

**) Docket No.: 22-CR-0002**

**Matthew Jefferson )**

1. **FACTUAL BACKGROUND**

On or about October 28, 2021, Defendant Matthew Jefferson was found in the United States, having knowingly and unlawfully reentered the United States without first applying to the Attorney General of the United States for permission to reapply for admission and without receiving in response the express consent of the Attorney General to reapply for admission.

1. **PRESENTENCE REPORT GUIDELINE SENTENCING RANGE AND OBJECTIONS**

The final *Presentence Investigation Report* provides the guideline range of one to seven months imprisonment based on a criminal history category II and total offense level of 6.

1. **MR. JEFFERSON MOVES FOR A DOWNWARD DEPARTURE**

*Defendant’s criminal history category II.*

The final *Presentence Investigation Report* provides Mr. Jefferson has 13 criminal history points and produces a Criminal History Category II.

*Nature and circumstances of the offense.*

Mr. Jefferson’s offenses are nonviolent and have no victims.

1. **APPLICATION OF THE STATUTORY FACTORS TO DEFENDANT MATTHEW JEFFERSON**

Matthew Jefferson respectfully asks this Court to consider all 3553(a) factors and specifically those outlined below in fashioning a sentence that is sufficient but not greater than necessary.

Mr. Jefferson is thirty-two years old. He is the oldest of eleven children. Four of his siblings live in the United States, but his parents and the rest of his siblings still reside in Mexico. His father was away for work for most of Mr. Jefferson’s childhood, so he stepped up as the man of the house and cared for his younger siblings.

Mr. Jefferson is married and has one daughter who is three years old. He lived in Coatesville, Pennsylvania with his wife and daughter before his arrest. He speaks to his wife and daughter, but his wife is not able to visit him in prison because they do not have a proper marriage license. Mr. Jefferson plans on returning to Mexico to live with his parents and work as an electrician when he is released.

Mr. Jefferson suffers from bipolar disorder but is not currently on medication. He met with a therapist prior to his arrest. Mr. Jefferson has not been able to receive any treatment while in custody.

Mr. Jefferson is a high school graduate from a local high school in Mexico City. Mr. Jefferson worked as an electrician and plumber before his arrest and plans to continue doing so after his release.

Mr. Jefferson stands before this Court remorseful for his actions. He assures the Court he will return to Mexico after his release and will never be involved in criminal behavior of any kind ever again. Mr. Jefferson is committed to creating and maintaining a happy and healthy life for his family.

1. **RECOMMENDED SENTENCE**

For all the foregoing reasons, Defendant Matthew Jefferson submits that a sentence below the guideline range is sufficient but not greater than necessary.

Respectfully submitted,

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January 4, 2022 Attorney for Defendant Denise Widener

The Honorable Mark A. Kearney

United States District Court

Eastern District of Pennsylvania

Dear Judge Kearney,

It is with great honor and respect that I write this letter to you on behalf of Matthew Jefferson. My name is Jillian Jefferson and Matthew is my older brother. I have ten siblings and Matthew is the oldest of all of us. He has been a role model and a caretaker throughout our entire life. I, along with three of my other siblings - Lindsey, Mark, and Christian - live in the United States. The rest of our siblings and our parents live in our birthplace of Mexico City, Mexico. I reside in Camden, New Jersey and see Matthew and his wife and daughter every week. Matthew made only me and my other three siblings living in the United States aware of his situation because he did not want to worry our family in Mexico, especially our parents. When Matthew told me he did not want to involve our parents or siblings in Mexico, I thought it was so like Matthew to do something like that. He always puts his family first.

Our father worked a lot throughout our childhood and was not around a lot. Matthew stepped up to be a father figure for me and all our siblings. Matthew has always been the greatest example of a loving, strong, and faithful man. When we were kids, he taught me how to ride a bike, helped me with my homework, and showed me how to be a good person. Matthew now has a wife and one daughter whom I am very close with. He is an amazing husband and father, and he needs to be home with his family to care for them.

As you consider my brother Matthew’s sentence, I respectfully ask that you please consider who he is as an individual and the positive impact he has on his whole family.

Sincerely,

Jillian Jefferson

5489 Main Street

Camden, PA 08030

Cellphone 215-647-8930

1. The 2016 Guidelines Manual remains the most recent available, as a 2017 edition will not be promulgated. [↑](#footnote-ref-1)
2. On June 23, 2020, during an interview, the defendant told DHS agents he entered the United States three days earlier by climbing over a fence near Casa Grande, Arizona. [↑](#footnote-ref-2)
3. In 2015, the defendant was convicted of two counts of the delivery of cocaine. [↑](#footnote-ref-3)
4. The defendant could not recall the name of the flooring company. [↑](#footnote-ref-4)
5. If the Early Disposition Program is granted by the Court, the total offense level would be 4, with a criminal history

   category of II. The guideline imprisonment range would then be zero to six months. [↑](#footnote-ref-5)