

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Criminal Case No. 21-cr-00188-RBJ-1

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANTHONY ZAGHAB,

Defendant.

**GOVERNMENT'S MOTION TO GRANT THE DEFENDANT AN ADDITIONAL
ONE-LEVEL DECREASE PURSUANT TO U.S.S.G § 3E1.1(b)**

The United States of America respectfully moves for an additional one-level reduction in defendant Anthony Zaghab's offense level pursuant to Section 3E1.1(b) of the United States Sentencing Guidelines. Defendant's agreement to plead guilty and

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timely notice thereof permitted the government to avoid preparing for trial and permitted both the government and the Court to allocate their resources more efficiently.

Respectfully submitted,

MATTHEW T. KIRSCH
Acting United States Attorney

By: s/ Martha A. Paluch

Martha A. Paluch

By: s/ Rebecca S. Weber

Rebecca S. Weber

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Attorneys for the United States

CERTIFICATE OF SERVICE (CM/ECF)

I hereby certify that on October 29, 2021, I electronically filed the foregoing with the Clerk of Court using the ECF system that will send notification of such filing to all parties of record.

/s Martha A. Paluch

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