

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE AT GREENEVILLE**

UNITED STATES OF AMERICA	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Docket No. 2:22-CR-76
	)	JUDGE GREER
CHAD BRANDON THOMAS	)	
	)	
Defendant.	)	

SENTENCING MEMORANDUM

Comes now your Defendant, Chad Brandon Thomas, by and through counsel, and brings forth this Sentencing Memorandum in order to assist the Court in issuing a sentence that is sufficient, but not greater than necessary, to meet the ends of justice.

I. PROCEDURAL BACKGROUND

Mr. Thomas does not dispute the procedural background and history of this case. In the early months of the year 2020, the entire world was struck with a global pandemic called the Coronavirus. Many decent and normal humans lost their minds at the fear of death, destruction, and financial ruin. Mr. Thomas was like many of those people. The offense conduct is stated in the PSR Report filed with this Court on December 2, 2022, Document 29. Mr. Thomas has minimal criminal history. But what Mr. Thomas does have is a history of emotional and psychological problems exacerbated using methamphetamine. As noted in the PSR, Mr. Thomas was admitted to Woodbridge Hospital in April of 2020 and again a few months later. It is during this time that the crimes were committed. The Psychological Evaluation (Doc. 37) reiterates this on pages six through eight. He lost touch with reality which was exacerbated by his methamphetamine use. He quickly became homeless. No one

could imagine his mental crisis at that time. This is offered not as an excuse, but for a reason for his actions and crime. These are the crimes he has admitted and is ready to take full responsibility.

Mr. Thomas has a network of friends and family that are standing by him. That is more than a little thing in cases before this Court. His parents, Brenda and David Thomas, raised a good son. The detail given in their letter of support shows a family that is strong and will continue to be strong to assist Mr. Thomas with his life once he has paid his debt to society. They more than hope and pray for his continued mental health treatment.

II. 18 U.S.C. § 3553(a) FACTORS

It is without dispute that Mr. Thomas suffered a tragic and traumatic emotional and mental breakdown in the year 2020. Again, it does not justify his actions, but those circumstances do help paint the picture of what was going on in his mind and his world at that time. Mr. Thomas, until recently, has had a significant history of substance abuse. As the Court is aware, substance abuse is the self-medicated route that people will take to cope with underlying issues. It was a perfect storm.

As his family life was crumbling and his business failing, he turned to methamphetamine as coping mechanism. Mr. Thomas has worked in the construction business his entire life. It is all that he knew. It is the one thing he believed he could hold on to. Mr. Thomas has taken steps even after he was indicted to better himself and to forge a new path into the future. This is evidenced by the letter submitted by Matthew Allison, the Director of New Opportunities Sober Living home in Maryville, Tennessee.

Mr. Douglas Blackley, a certified public accountant, met with Mr. Thomas on May 18, 2021, to assist him in the financial mess he made. The letter submitted by Mr. Blackley shows

the mental state of Mr. Thomas in May of 2021. Even after this alarming visit, he has agreed to assist him further upon his release to rectify the past tax issues. This is a very large endeavor. Mr. Thomas reached out to him, and he agreed. This says something about his character. He is no longer trying to hide from the world, he is actively trying to correct it, even behind bars.

III. CONCLUSION

Mr. Thomas agrees that the crime he has pled guilty to speaks for itself and though it was not an easy path to get himself to come to terms with the reality for which he is living, he has done so at this time. Mr. Thomas is requesting that this Court recommend him for all programs that may be afforded to him while incarcerated. Mr. Thomas seeks a sentence that is at the bottom of the guideline range as that will most certainly be a sentence that is sufficient but not greater than necessary to meet the ends of justice.

Respectfully submitted, this the 20th day of August 2023.

Defendant Chad Brandon Thomas

s/ Donna M. Bolton

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CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of August, 2023, the foregoing document was filed electronically. Notice of this filing is sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.

s/ Donna M. Bolton

Donna M. Bolton