

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Criminal Case No. 1:21cr-00165-RM

UNITED STATES OF AMERICA,

Plaintiff,

v.

2. CHANDLER SIMBECK,

Defendant.

**GOVERNMENT'S MOTION FOR THIRD POINT REDUCTION PURSUANT TO
U.S.S.G. § 3E1.1(b)**

The United States of America, by and through undersigned counsel, moves the Court to decrease the defendant's offense level by 1 level pursuant to U.S.S.G. § 3E1.1(b) because 1) the offense level determined prior to application of U.S.S.G. § 3E1.1(a) is greater than 16, and 2) the defendant has assisted authorities in the investigation and prosecution of his own misconduct by timely notifying authorities of his intention to plead guilty thereby permitting the government to avoid preparing for trial and permitting the government and Court to allocate their resources efficiently. *See* U.S.S.G. § 3E1.1(b).

COLE FINEGAN
United States Attorney

By: s/ Robert Brown
ROBERT BROWN
Assistant United States Attorney
1801 California St., Suite 1600
Denver, Colorado 80202
E-mail: Robert.Brown5@usdoj.gov
Attorney for the United States

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of December, 2023, I electronically filed the foregoing **GOVERNMENT'S MOTION FOR THIRD POINT REDUCTION PURSUANT TO U.S.S.G. § 3E1.1(b)** with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record in this case.

s/ Robert Brown
U.S. Attorney's Office