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May 29, 2025

Via ECF

Honorable Mary Kay Vyskocil
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Chris Recamier*, 21 Cr. 746 (MKV)

Dear Judge Vyskocil:

Pursuant to this Court's April 8, 2025 Order (ECF 157), Chris Recamier respectfully submits this reply in support of his motion for resentencing pursuant to Amendment 821 to the U.S. Sentencing Guidelines (ECF 160).

On May 21, 2025, the government submitted its response to Mr. Recamier's motion. (ECF 161). There, the government stated that it "agrees with the Probation Office and [Mr. Recamier] that Amendment 821 reduced the Guidelines range applicable in this case." *Id.* at 1. The government further noted that it "consents to resentencing within the new Guidelines range, which may include the imposition of the existing sentence or a reduced sentence." *Id.*

Mr. Recamier respectfully submits that a sentence of 87 months' imprisonment, at the bottom of the amended Guidelines range, is warranted. This Court previously sentenced Mr. Recamier to the bottom of the original Guidelines range. In crafting that sentence, in addition to accounting for the seriousness of the offense and need for deterrence, this Court considered Mr. Recamier's life circumstances and his acceptance of responsibility. ECF 104, Sentencing Tr. ("Tr.") at 30–33. This Court also considered the educational and work programs Mr. Recamier had taken advantage of during pretrial detention. *Id.* at 31–32.

Time has shown that this Court was correct to sentence Mr. Recamier at the bottom end of the Guideline's range. Mr. Recamier has taken control of his addiction and been clean since his incarceration. Mr. Recamier has only further taken advantage of work and education programs. *See* ECF 151, Supplemental Presentence Report ("Supplemental PSR") at 4.

The § 3553(a) factors that guided this Court to a sentence at the bottom of the original Guidelines range still counsel a sentence at the bottom of the amended Guidelines range. Mr. Recamier's life

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has been plagued by addiction and he had a difficult upbringing. *See* ECF 76, at 3–4 (citing 18 U.S.C. § 3553(a)(1); Presentence Investigation Report, ECF 71 (“PSR”) ¶¶ 84–86; 99–103). He is 62 years old, with a number of health issues complicated by a lifetime of heroin addiction. *See id.* at 4–5 (citing PSR ¶¶ 97, 99–103). Importantly, Mr. Recamier accepted responsibility for his actions, pleading guilty shortly after new counsel was appointed. *See id.* at 5–6.

For these reasons, Mr. Recamier respectfully requests that this Court resentence him to 87 months’ imprisonment, at the bottom of the amended Guidelines range.

Respectfully submitted,

/s/ Marc Greenwald

Marc Greenwald
Michael Linneman