



U.S. Department of Justice

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District of New Jersey*

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March 13, 2025

VIA ECF

The Honorable Brian R. Martinotti
United States District Judge
Frank Lautenberg Post Office & U.S. Courthouse
2 Federal Square
Newark, NJ 07102

Re: *United States v. Gregory Blotnick*,
Crim. No. 21-796-BRM

Dear Judge Martinotti:

Please accept this letter opposing Defendant Gregory Blotnick's motion for a reduction in sentence pursuant to 18 U.S.C. § 3582(c)(2) on the basis of Amendment 821 to the United States Federal Sentencing Guidelines (D.E. 28) (the "Motion"). The Motion should be denied because Defendant is ineligible for any relief under that Amendment.

First, Amendment 821, Part A, which addresses status points, does not apply to Defendant because he did not receive any status points at sentencing. Specifically, Defendant received one criminal history point derived from a prior criminal sentence. PSR ¶¶ 61-62. Having received no status points, Defendant is not eligible for relief under Part A.

Second, Amendment 821, Part B, Subpart 1, which provides a reduction for certain zero-point offenders, also does not apply to Defendant because, having received one criminal history point at sentencing, he was not a zero-point offender.

For these reasons, the Motion should be denied.

Respectfully submitted,

JOHN GIORDANO
United States Attorney

/s/ Andrew M. Trombly

By: Andrew M. Trombly
Assistant U.S. Attorney