IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA :

v : CRIMINAL NO.: GLR-20-350

ANDRE WEBB, ET AL, :

SENTENCING MEMORANDUM ON BEHALF OF ANDRE WEBB

Andre Webb submits this Sentencing Memorandum in support of his request that this Honorable Court consider when sentencing him to 33 months to 41 months imprisonment (**the guideline imprisonment range**) and that your sentence run concurrently with the sentence he is presently serving for an unrelated matter. (Case ELH -18-00493). The reasons for the request are as follows:

Mr. Webb requested that I advise the Court that he has been in custody since his arrest on or about September 21, 2018, as a result of Judge Hollander's case. On January 10, 2020 Judge Hollander imposed a sentence of 96 months incarceration.

While awaiting sentencing in Judge Hollander's matter, Mr. Webb was indicted in the present case on October 14, 2020. On January 11, 2019, while confined at the Chesapeake Detention Facility, Mr. Webb's pod was searched. Mr. Webb was found to be in joint possession of a contraband cellphone and 59 strips of Soboxone on his person. Subsequently at an Administrative Hearing, Mr. Webb plead guilty and received a sentence of thirty (30) days in segregation for that infraction.

While serving his sentence at Fairton FCI, Mr. Webb was indicted on October 14, 2020, in the present matter. Since his transfer from Fairton, Mr. Webb has been denied the opportunity to participate in programs under the First Step Act and believes he was denied good time credits. Mr. Webb contends that his overall sentence has been increased by approximately one and a half years due to the transfer. On December 19, 2022, the Defendant appeared before this Honorable Court and pleaded guilty to the one count of the Indictment. The present offense occurred nearly 18 months before he entered his guilty plea.

After being transferred from Fairton FCI, on January 2021 Mr. Webb was transferred to Northern Neck Regional Jail, Warsaw, VA and has been detained there since that time. For some unexplained reason Mr. Webb was transferred out of Fairton to North Neck Regional Jail and never provided with an explanation for his transfer.

Since arriving at Northern Neck Regional Jail Mr. Webb has maintained a flawless institutional record. Prior to starting the prior lengthy period of incarceration imposed by Judge Holland, Mr. Webb suffered from a horrible opioid addiction. While institutionalized, Mr. Webb has not tested positive for any CDS. Mr. Webb has completed two (2) drug programs and is looking forward to participating in and completing the RDAP Program.

Mr. Webb further contends that he has suffered some deprivation of nutritious foods, exercise, school programs, family visitations, counseling, and most importantly essential medical treatment. He has been diagnosed with Gout and it is his belief that this condition is as a result of his irregular eating habits and excessive weight gain due to lack of exercise. Mr. Webb will elaborate further on these points when given the opportunity to elocute at Sentencing.

Accordingly, Mr. Webb is respectfully requesting that this Honorable Court consider imposing a concurrent sentence to that of Judge Hollander. Mr. Webb asks that this Honorable Court give consideration to the general rule under 18 U.S.C § 3584 (a) that multiple terms of imprisonment "at different times" run consecutively UNLESS the Court orders that the terms are to run concurrently.

In conclusion of the foregoing reasons, my client, Mr. Webb respectfully requests that this Honorable Court impose a sentence of 33 months to 41 months of imprisonment to run concurrently to the sentence he is presently serving and that the requested sentence will be sufficient to satisfy the purpose of sentencing.

Respectfully submitted,

_____/s/_____

Ronald I. Kurland, Esquire #7406010108
KURLAND & KURLAND, P.A.
10 E. Chase Street
Baltimore, MD 21202
Tel: 410-547-1670
Fax: 410-837-8522
rikesq@hotmail.com
Attorney for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 3rd day of March 2023, a copy of the foregoing **Sentencing Memorandum on behalf of Andre Webb** was e-filed through PACER to: United States Attorneys' Office for the District of Maryland, 6625 U.S. Courthouse, 101 W. Lombard Street, Baltimore, MD 21201.

_____/s/_____
RONALD I. KURLAND