UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 21-20157-CR-ALTONAGA

UNITED STATES OF AMERICA

vs.

IOANNIS KRALIEVITS,

Defendant.
_____/

MOTION FOR REDUCTION OF SENTENCE
PURSUANT TO U.S.S.G. § 5K1.1

Pursuant to United States Sentencing Guideline Section 5K1.1 and Title 18, United States Code, Section 3553(e), the United States of America, by and through the undersigned Assistant United States Attorney, hereby moves for a downward departure from Ioannis Kralievits' advisory sentencing range under the United States Sentencing Guidelines, in order to reflect her substantial assistance in the prosecution of others. In support of this motion, the Government states the following:

1. On April 14, 2021, the defendant pled guilty to an information charging one count of conspiracy to commit an offense, in violation of Title 18, United States Code, Section 371.

2. The defendant has provided substantial assistance to the government in the investigation and prosecution of others who have committed crimes against the United States.

3. At the sentencing hearing scheduled for June 30, 2021, the United States will provide the Court with further information regarding the nature and quality of the defendant's cooperation and make a specific recommendation regarding an appropriate sentence reduction.

WHEREFORE, the United States respectfully requests this Honorable Court to grant this motion for reduction of sentence pursuant to United States Sentencing Guideline 5K1.1, following a hearing on this matter.

Respectfully submitted,

JUAN ANTONIO GONZALEZ
ACTING UNITED STATES ATTORNEY

By: s/Michael N. Berger
MICHAEL N. BERGER
ASSISTANT UNITED STATES ATTORNEY
Court No. A5501557
99 NE 4th Street
Miami, Florida 33132
Tel: 305-961-9445
E-mail: Michael.berger2@usdoj.gov

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically filed with the Court's CM/ECF system on June 24, 2021:

By: /s/ Michael N. Berger
Assistant United States Attorney