IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
WESTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	No. 20-CR-4066-LTS-KEM
	)	
vs.	)	
	)	
DONALD FRANKLIN TROSIN,	)	
	)	
Defendant.	)	

GOVERNMENT'S
SENTENCING MEMORANDUM

Pursuant to the Court's Order (docket no. 67), the government provides the following information to the Court:

Potential Witnesses:

1. None

Potential Exhibits:

1. Criminal Complaint in *United States v. Sakyi*, No. 21-CR-4013-LTS
2. Excerpt from Detention Hearing in *United States v. Sakyi*, No. 21-CR-4013-LTS
3. Quitclaim Deed
4. FBI Agent Report of Attempt to Interview Defendant

Issues:

1. Whether a two-level enhancement for sophisticated laundering is appropriate, pursuant to USSG §2S1.1(b)(3)?

2. Whether a two-level enhancement is appropriate under USSG §3C1.1, because defendant obstructed or impeded the administration of justice, or attempted to do so?

3. Whether a special condition requiring defendant to participate in a mental health evaluation, and to comply with any recommended treatment, is appropriate?

4. Whether a joint and several restitution obligation is appropriate?

A separate brief is attached to this Sentencing Memorandum.

Respectfully submitted,

SEAN R. BERRY
Acting United States Attorney

By, /s/ *Timothy L. Vavricek*

TIMOTHY L. VAVRICEK
Assistant United States Attorney
111 Seventh Avenue, SE, Box 1
Cedar Rapids, IA 52401
319-363-6333
319-363-1990 (Fax)
Tim.Vavricek@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on July 6, 2021, I electronically filed the foregoing with the Clerk of Court using the ECF system which will send notification of such filing to the parties or attorneys of record.

UNITED STATES ATTORNEY

BY: /s/ TLV

Copy to:
Mr. Timothy Herschberger
USPO