

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION**

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	
v.	)	
	)	Cause No.: 2:21 CR 154
	)	
JEFFERY BOYLETT	)	
	)	
Defendant	)	

DEFENDANT’S SENTENCING MEMORANDUM

Comes now the Defendant, Jeffery Boylett, by his Attorney Adam Tavitias and files the following Sentencing Memorandum.

SENTENCING REQUEST

Jeffery Boylett requests that this Honorable Court sentence him below the applicable guideline range as determined by the Final Presentence Report to twelve (12) months and one (1) day of imprisonment.

SENTENCE RECOMMENDED BY THE SENTENCING GUIDELINES

Jeffery Boylett pled guilty count 1 of the indictment to Wire Fraud in violation of Title 18 U.S.C. 1343 He faces a maximum term of twenty (20) years incarceration, a maximum term of supervised release of three (3) years, and a \$250,000 fine. Pursuant to the Pre-Sentence Investigation Report, Jeffrery Boylett’s total offense level is thirteen (13) and his criminal history category is III for a recommended guidelines range of 18 to 24 months.

NATURE OF THE OFFENSE

On April 10, 2020 Mr. Boylett submitted a fraudulent application indicating he had a business called “Bills”, was involved in health services, had five (5) employees, and had been operating for over twenty (20) years. When he submitted this application, he in fact did not have this business and it never existed. As a result of filling out this application, he received \$109,900 from the Small Business Administration.

JEFFERY BOYLETT’S HISTORY AND CHARACTERISTICS

At the time of sentencing Mr. Boylett will be forty (40) years old. When he completes his sentence, he wants to live a law abiding life. He is sorry for his actions and truly did not mean to harm anyone. It was something he did that he truly regrets. He understands that because of his actions he will be away from his family and friends and has no one to blame but himself.

Mr. Boylett wants to provide for his family with gainful employment after he is released from the Bureau of Prisons. He also wants to be employed to start paying back the money he unlawfully received. He currently is a barber and has been for many years.

He has lived in Northwest Indiana for almost his entire life. He does not have much of a criminal history. Sixteen (16) years ago he received his only other felony conviction for Possession of a Controlled Substance in which he served a sentence of four (4) years imprisonment. This case was filed eleven (11) months ago. Since that time he has not received any new charges and has been compliant with pretrial release.

CONCLUSION

The Defendant respectfully asks that he be sentenced to no more than twelve (12) months and one (1) day of imprisonment and one (1) year of supervised release. He also requests credit for the time he has already spent incarcerated in this case. He also would like the Court make a recommendation to the Bureau of Prisons that he serve his remaining sentence as close as possible to Northwest Indiana. In addition since he has been compliant on pretrial release he requests thirty (30) days to self -surrender after his sentencing hearing.

Respectfully Submitted,

/s/ Adam Tavitas

Adam Tavitas, #18451-53

Attorney for Defendant

751 E. Porter Avenue, Suite 3

Chesterton, IN 46304

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION**

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	
v.	)	
	)	Cause No.: 2:21 CR 154
	)	
JEFFERY BOYLETT	)	
	)	
Defendant	)	

CERTIFICATE OF SERVICE

I hereby certify that, on the 14th day of October, 2022 I electronically filed a complete copy of Defendant's Sentencing Memorandum and this Certificate of Service with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

Thomas McGrath
Thomas.McGrath@usdoj.gov