

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

- against -

Docket No.
24 Cr. 361 (DG)

JOHN BOLDEN

Defendant

SENTENCING MEMORANDUM FOR JOHN BOLDEN

To: The Honorable Diane Gujarati
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201
Courtroom: 4B South

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"I do solemnly swear (or affirm) that I will support the constitution of the United States, and the constitution of the State of New York, and that I will faithfully discharge the duties of the Office of Police Officer in the New York City Police Department, according to the best of my ability." John Bolden, 2006. In January 2006, surrounded by family and friends, as John Bolden recited this Oath of Office as one of the newest members of the New York City Police Department ("NYPD"), he never imagined that he could one day spend years behind bars in a federal prison. Raised by two strict, hardworking parents, John Bolden navigated the gritty streets of Clinton Hill, Brooklyn in the 1990s and overcame the statistical odds of success. He made it out. Unbeknownst to him in 2006, in the years to come, John would encounter debilitating financial trouble, struggle with the shame of continued failure and eventually lose himself in misguided ambition. He would then undergo a moment of sobering clarity, leading with honesty and transparency, and find his way back to that noble young officer that embraced hard work, provided for his family, and pledged to serve and protect his community as he took his Oath of Office back in 2006.

This Memorandum is respectfully submitted in advance of the sentencing of John Bolden scheduled for June 3, 2026, at 10am. I have reviewed the Presentence Investigation Report [PSR] with Mr. Bolden and we have communicated our objections to the Department of Probation.

The Indictment and Guilty Plea

The Indictment charged Mr. Bolden with Disaster Relief Fraud in violation of 18 U.S.C. 1040(a)(2), 1040(b)(1), 2 and 3551, two Wire Fraud Conspiracies in violation of 18 USC 1349 and 3551, and three counts of Wire Fraud in violation of 18 U.S.C. 1343, 2 and 3551. The charged conduct occurred between approximately May 2020 to October 2022. Mr. Bolden

appeared before Magistrate Judge Vera M. Scanlon on February 18, 2026 to enter his guilty plea to Count 2 (Wire Fraud Conspiracy) pursuant to a plea agreement with the Government. On April 15, 2026, Your Honor issued an order accepting Mr. Bolden's guilty plea.

Unfortunately, Mr. Bolden had a lapse in judgment and made the poor decision to participate in this conspiracy. Despite holding a full-time position as an NYPD officer, he made a misguided decision to commit wire fraud, driven by worries about providing for three children and securing enough funds for retirement amidst his rising debt. While his concerns were personal and understandable, his actions violated the law and the trust placed in him by the public. Mr. Bolden could not confront what he perceived to be insurmountable debt. He could not face his family and admit that he had plunged the family into financial ruin. Since his arrest in this matter, he has worked very hard to communicate openly and honestly with his wife and manage his debt to avoid the situations that initially led him to commit the offense conduct. He deeply regrets breaking the law, violating the public's trust, and jeopardizing his ability to properly take care of his family.

Sentencing Request

John Bolden respectfully requests that the Court impose a sentence of time served, to be followed by two (2) years' supervised release. Should the Court feel inclined to impose a custodial sentence, we would ask that the Court please impose such a sentence to be served via home confinement to allow John to continue the intensive care he provides for his special needs child and his sick father. The U.S. Probation Department Sentence Recommendation report recommends a sentence of fifty-one (51) months' imprisonment followed by two (2) years' supervised release¹ After his arrest John was presented and released on a Personal

¹ U.S. PROBATION DEPARTMENT SENTENCE RECOMMENDATION report

Recognizance Bond, with pretrial services reporting requirements. He spent almost two years in the community under pretrial supervision with no issues. His flawless behavior on supervised release is an indication that should the Court sentence John Bolden to a non-custodial sentence, or a sentence served via home confinement, he will be able to fully comply with all conditions of his sentence.

We make this request pursuant to the Court's authority under *United States v. Booker*, 534 U.S. 220 (2005) and 18 U.S.C. § 3553(a). In our request for the desired sentence, we ask that the Court consider the following factors: 1) John's exemplary track record until his arrest on this matter, 2) the effects of the financial pressures that John was experiencing in and around the start of the conspiracy and 2) John's accountability for and ownership of his conduct charged in the indictment. While these three factors do not excuse or justify his criminal conduct, John Bolden asks that the Court please consider these factors in determining an appropriate sentence pursuant to 18 U.S.C. § 3553(a).

I. PRELIMINARY STATEMENT

John Bolden is a forty-eight-year-old man who admittedly made poor choices after giving in to desperation in one of the most vulnerable moments of his life. In May 2020, he entered the charged conspiracy while under significant financial and personal stress. Unable to bring himself to tell his wife that he had dumped their savings into two failed businesses while the family was drowning in debt, John Bolden did the unthinkable in hopes of keeping his failing businesses afloat and restoring his family's savings. While he is here today because of the decisions he has made, the choice he made in May 2020 was from the mind of a desperate man who had a fleeting lapse in judgment when confronted with what he perceived to be

insurmountable debt. At the root of the issue of sentencing is the Court's determination of the life decisions that John Bolden will make going forward. Such determination by the Court is critical to deciding the length and the type of the sentence to be imposed. Given that John is forty-eight (48) years old, has maintained consistent employment since he was thirteen (13) years old, and has no criminal record, we submit that it is highly unlikely that he will commit any further crimes.

II. BACKGROUND

Childhood into Adulthood

John Bolden was born in Brooklyn Hospital in Brooklyn, New York, to Jacqueline Johnson and Johnnie Bolden.² At the time of his birth, John's mother was employed full-time as a sales representative for the United States Post Office, and his father also worked for the Post Office as a mail handler. His parents were never married and never lived together as a family unit, but John had equal contact with both parents. For a portion of his childhood, John's mother resided in the Clinton Hill section of Brooklyn while his father lived separately in the Fort Greene section of Brooklyn. At some point in his early childhood, John's father moved to Clinton Hill in an apartment two blocks away from John's mother to ease co-parenting. Although his parents maintained contact with one another and lived only two blocks apart for many years, they were not in a romantic relationship, amicable communication was inconsistent, and so John primarily lived with his mother during his early childhood.

John was an only child and was raised in a modest, working-class environment. His mother worked hard to provide stability and ensure that he had food, clothing, and educational opportunities, even when finances were tight. The family lived paycheck to paycheck, but his

² Defendant John Bolden and his father, Johnnie Bolden have very similar names. To avoid confusion, I will refer to my client as "John" and his father as "Mr. Bolden" throughout this sentencing memorandum.

basic needs were always met. Growing up in Clinton Hill during the height of Brooklyn's crime epidemic in the 1990s, John was regularly exposed to violence, street culture, and instability. His mother, determined to shield him from those influences, worked full-time and sacrificed financially to send him to private school despite the strain it placed on the family's limited resource. His mother prioritized education and enrolled him in Junior Academy Elementary School, a private school in Brooklyn. John commuted to school by city bus each day and often encountered neighborhood children who bullied him because he attended private school. As a child, he learned quickly that he had to defend himself physically to avoid being victimized.

Despite the instability between his parents and the difficult environment around him, John performed well academically. He consistently earned strong grades, maintained approximately an A-minus average, and was placed in honors classes throughout school. Although he occasionally tested boundaries as a teenager by staying out late and spending time on the streets in the neighborhood, he remained committed to school and avoided disciplinary issues in the classroom. John's parents were strict and continued to reiterate and instill in him the importance of completing school so that he could make it out of the neighborhood one day. When he misbehaved, his mother disciplined him by taking away privileges and limiting his ability to socialize with friends, but she ultimately became overwhelmed by his increasingly unruly teenage behavior.

At age thirteen, John's life changed significantly when his mother relocated to California to work with her brother in the tax business after retiring from the Post Office. Feeling unable to manage his behavior on her own, she sent him to live with his father in his father's Clinton Hill apartment. The transition was emotionally difficult for John and created some feelings of resentment and abandonment that stayed with him for some years. Unlike many children in his

neighborhood who were raised primarily by single mothers, John was now living with a strict and emotionally distant father who had been raised in the Fort Greene housing projects and served as a Vietnam veteran. His father was not nurturing and believed strongly in toughness, self-reliance, and discipline. On one occasion, his hat was stolen by other children, and when he informed his father, his father told him that because he allowed someone to take it, he would not be getting another one. John thereafter wore only the hood of his coat during the winter months.

Shortly after moving in with his father, John obtained his first job through Emmanuel Baptist Church in Clinton Hill, where he had previously attended summer camp. He worked in the church's afterschool program tutoring children and cleaning facilities for approximately four (4) dollars per hour. He worked every day after school, and his father required him to contribute half of each paycheck toward household bills. John used the remaining money to purchase clothing and personal items because his father did not believe in buying expensive sneakers or fashionable clothing. This experience instilled in him a deep sense of responsibility and a belief that he always needed to work to support himself and others. Even as John stayed the course as a "good kid" in the 1980s and 1990s, he could not fully escape the violence of Brooklyn. At age fifteen, he was attacked by a group of approximately thirteen teenagers while playing basketball in Bedford-Stuyvesant. He returned home bruised and bloodied, only to be asked by his father whether he had at least fought back against one of his attackers. This experience and his father's reaction to his experience reinforced a worldview centered on toughness, survival, and personal responsibility. This would be the framework for how John viewed his place in society.

During the summer of 1995, before his senior year of high school, John visited his mother in California from June to August and worked at a 7-Eleven owned by his maternal uncle. He saved all the money he earned and brought it back to Brooklyn just in time to start

school in September. Although he maintained periodic contact with his mother while she lived in California, their relationship felt strained at times due to her departure during his adolescence. Despite these hardships, John persevered and his academic success was unwavering. He graduated from Bishop Ford High School in Brooklyn in 1996. He then enrolled at St. John's University, where he majored in Criminal Justice. He commuted from his father's home and approached college with the same disciplined mentality he applied to work. While attending St. John's University, John did not participate in extracurricular activities as he continued to also work full time. There was no time for fun or friends. John, instead, viewed his college education as a necessary path toward financial stability and career advancement.

Employment and Work Ethic

One semester away from graduating from St. John's University, John briefly struggled to establish direction in his life. He split time between his mother's and father's homes and spent a couple of months unemployed while trying to decide how he was going to pay for his final semester of college. John started to feel discouraged and lose focus. He was not working and he was not going to school, so he hung around the neighborhood with people that were not doing anything. His mother eventually gave him an ultimatum that he needed to obtain employment or move out. By the end of that summer, John had secured two full-time jobs simultaneously. During the day, he worked for Burns Security as a supervisor. His duties included supervising security guards, overseeing payroll, and monitoring timekeeping. At night, he worked for the Bowery Residents' Committee ("BRC") conducting homeless outreach throughout New York City, attempting to persuade unhoused individuals to come into shelters and receive services. Working overnight shifts while maintaining his daytime employment, John established a pattern of relentless work that would continue throughout his adult life. He eventually graduated from

St. John's University in 2001, earning his bachelor's degree in criminal justice. From a young age, John understood that financial stability was not guaranteed and that success required discipline and relentless effort. Those values stayed with him throughout his adult life and shaped both his career choices and his identity as a husband and father.

ACS and NYPD

By 2002, John secured more stable employment working for the Administration for Children's Services ("ACS") as a Child Protective Specialist at 1274 Bedford Avenue, Brooklyn, New York. He earned approximately \$40,000 annually and became deeply committed to protecting vulnerable children. He investigated abuse cases, coordinated family services, testified in Family Court on behalf of children, assisted with foster care placement, and advocated for the safety of children living in dangerous environments. One particularly traumatic case involved the accidental drowning death of a two-year-old child whose family could not afford funeral expenses. After New York City declined to provide financial assistance to bury the child, John personally raised money from coworkers and contributed his own funds to ensure the child received a proper burial. The emotional impact of that case continues to affect him profoundly as he raises his own children. He began to feel the need to do more to help protect people in his community.

Working at ACS inspired John to explore a career in law enforcement. Motivated by a growing desire to serve and protect the community at large, he entered the police academy on July 11, 2005 with the intention of solving the cold case murder of his paternal grandfather, NYPD Officer Robert Bolden of the 75th Precinct. Robert Bolden who was gunned down in 1971 by an unapprehended person in a bar and the case was never solved.³ John's need to solve

³ See https://www.youtube.com/watch?v=1M7_FHAYUD0; See Also <https://pix11.com/news/local-news/brooklyn/grandson-of-slain-nypd-officer-hopes-to-crack-case-before-50th-anniversary-of-murder/>

the murder of his grandfather was largely influenced by his close relationship with his paternal grandmother. John explained that even though his grandfather was murdered almost six years before John was born, his grandfather's death left a destructive ripple effect on John's paternal grandmother and her children. Following Robert Bolden's murder, Robert Bolden's son and daughter (John's father's siblings) fell into severe drug addiction – ultimately leading to their deaths. Robert's widow (John's grandmother), whose health rapidly deteriorated following Robert's murder, lived with unmanaged depression for the rest of her life. She died when John was just thirteen (13) years old. Against his own father's wishes, John was determined and made every effort to heal his grandmother's broken heart and find closure for his family by solving the murder, but Robert Bolden's murder remains unsolved.

Shortly after joining the NYPD, John became a father when his first daughter was born on July 8, 2007. His second daughter followed in December 2008. In 2012, he married the mother of his children, Taliesha Bolden, whom he met while working at ACS and they all lived as a family of four in Clinton Hill. Fatherhood became a defining force in John's life. Seeking stability and long-term security for his family, he committed himself fully to his career with the NYPD. Over the course of his career, he developed a reputation as a hardworking and dependable officer, despite an incident in 2012 that resulted in John attending and completing an alcohol treatment program as described in the PSR.⁴ In October 2013, after years of hard work and overtime, he was promoted to Detective. Throughout his adult life, John consistently maintained employment, worked extensive hours, and devoted himself to supporting his family financially while attempting to provide his children with better opportunities and more stability than he had growing up. Also in 2013, motivated by a desire to remove his family from the

⁴ See United States Probation Department Pre-Sentence Report, page 19, paragraphs 92 -94

environment in which he was raised, John moved his family from Brooklyn to Valley Stream on Long Island so his children could attend better public schools and avoid many of the struggles he experienced growing up. He often worked as many overtime shifts as possible to increase his earnings so they could afford their upgraded life. Even while serving full-time with the NYPD, he consistently worked additional jobs and side gigs to support his family financially.

III. SENTENCING

The Nature and Circumstances of the Offense

John Bolden measured his worth by his ability to provide for others. In addition to supporting his wife and children, he also provided financial support for his retired mother after she moved into the family home. He carried these responsibilities largely on his own and rarely asked others for help. As a result, he and his wife incurred and continued to incur large amounts of debt.⁵ Even during periods of significant financial stress, he continued working extensive overtime hours while attempting to build additional sources of income for his family to try and tackle his debt. John worked sixteen-hour days seven days a week for NYPD and he moonlighted with other jobs whenever he was off from NYPD. He described himself as completely exhausted all the time, noting that his employment regimen was not sustainable. For years, he worked seven days a week and often sixteen-hour days, causing him to miss substantial portions of his daughters' childhoods. The physical and emotional toll became significant. He developed diabetes, experienced sleep problems and sleep apnea, and became increasingly overwhelmed by stress and anxiety. Hoping to create a more sustainable future for his family, he

⁵ See United States Probation Department Pre-Sentence Report paragraph 101 – This is debt attributed only to Mr. Bolden. Mr. Bolden instructs that his wife has her own separate debt totaling roughly the same amount as his minus the mortgage. Without the mortgage debt, his wife's debt is approximately \$120,089,

pursued several business ventures, including an ATM business and later a tax franchise business. John decided that opening a small business could generate enough supplemental income and alleviate the need to work excessive amounts of overtime. His attempts at entrepreneurship were not driven by greed or luxury, but by exhaustion and fear of remaining trapped in a cycle of endless work.

In late 2017, John decided to get into the ATM machine business. He knew someone that had reported success with owning and placing their ATMs in retail spaces. After speaking with his wife, John took \$20,000 of his savings and invested in ATM machines. Over the course of just over a year, John spent almost double his initial investment maintaining the machines and trying to get this business to generate profit. Unfortunately, John took a devastating loss as the business failed because the market was saturated with private ATMs and John was unsuccessful at securing lucrative locations in which to place his ATMs.

With no business acumen, John next tried his hand at joining a tax-preparing business franchise in 2019. John spent \$40,000 of his savings to buy into the franchise. He developed anxiety after the first failed business, but he could not give up. He assured his wife that he could recover what he lost in the ATM business and hopefully make some profit. At the time, the tax preparation business had just one office located on 167th Street in the Bronx and John and his partners paid \$7,000 in monthly rent pursuant to a lease agreement. In addition to rent, John paid employees and spent over fifty percent of their revenue on marketing and advertising in hopes of generating business. However, in the first year, the tax preparation business made no profit. In fact, they plunged into debt, and John could not tell his wife. In January 2020, John and his partners decided to open a second location on Southern Boulevard with the hope that a second location would generate more customers and increase revenue and overall profitability. For the

second location on Southern Boulevard, John was paying \$8,000 in monthly rent pursuant to a lease agreement. For both offices, he continued to pay overhead costs and employee compensation. Additionally, John and his partners were still obligated to pay a monthly franchise fee of thirty-five percent of their gross revenue. John and his partners were locked into both leases and were drowning in insurmountable debt.

By May 2020, six months before the birth of his third child, John was under significant financial and personal stress. Although employed full-time as an NYPD detective working substantial overtime, John was carrying nearly \$500,000 in debt alongside his wife. At the same time, he was financially supporting his retired mother, maintaining a mortgage of approximately \$3,200 per month, and attempting to keep afloat two newly opened franchise businesses that were rapidly failing during the onset of the COVID-19 pandemic. Despite generating revenue, the businesses produced no profit and instead deepened their financial obligations through rent, franchise royalties, and operating expenses. Overwhelmed by mounting debt, fear of financial failure, anxiety about providing for his growing family, and concerns about retirement security, he made the misguided and unlawful decision to participate in the charged wire fraud. While these pressures do not excuse his conduct, they provide important context for how a hardworking individual with a long history of supporting others and serving the public made the deeply misguided decision that ultimately brought him before this Court.

Characteristics of John Bolden

John Bolden is a family man.⁶ He lives and works only to care for his elderly parents, his wife and his children. It is important for the Court to know that John did not use money to fund a lavish lifestyle. He did not purchase luxury items, boats, expensive vacations, or

⁶ See Exhibit A - Letters from his family members

extravagant property. Instead, he became consumed by mounting financial obligations, failing businesses, family responsibilities, and fear of disappointing his wife and children. Ashamed of his business failures and lacking business experience or mentorship, he concealed the extent of his financial difficulties from his family while desperately trying to keep the businesses afloat during the economic uncertainty of the COVID-19 pandemic. He gave into desperation at a time when he was not thinking clearly. This conduct is clearly an aberration.

Need for Sentence Imposed

John Bolden painfully recognizes that there is nothing he can do to change the past and that there is nothing he can say to erase the hurt and shame he has caused his family. The stress of this case has negatively affected everyone that depends on him. For that, and for breaking the law, John is truly regretful. John Bolden has made progress in the areas of introspective and insightful thinking. Since his arrest, he has been honest with his family about the extent of his debt and financial burden. John realizes that more than money, his family needs his physical presence. As explained in some of the family letters, John is the primary caretaker of his five-year-old special needs son.⁷ He is also responsible for the daily function of the household and management of his son.⁸ As an only child, John is fully responsible as the caretaker of both parents – with his father in significantly poorer health than his mother.⁹

When this case ends, John Bolden plans to continue living a law-abiding life, providing for and taking care of his children, wife, and parents. He is not a recidivist. “When examining recidivism, the study of family relationships is often a key component in predicting repeat criminal behavior among formerly incarcerated individuals. Research suggests that strong family

⁷ See Exhibit B - J.B. III medical and educational records attached under seal

⁸ See Exhibit C – John Bolden’s Daily Schedule

⁹ See Exhibit D - Johnnie Bolden’s Medical Records attached Under Seal

ties produce lasting impacts among this population and often deter future incidents of crime (Bales and Mears, 2008). The study of family relationships on imprisoned men and women is centralized on the premise that strong family support will be beneficial in societal reintegration, while lack of family support puts these individuals at greater risk for criminal relapse.”¹⁰ John Bolden has already demonstrated that he is capable of living a law-abiding life as he does not have a criminal record in his almost fifty years of existence. While released on pretrial supervision, he did not commit any new crimes, nor did he violate any of the conditions set by the Court. Furthermore, the United States Sentencing Commission reported that “[o]ffenders with shorter lengths of imprisonment generally had lower recidivism rates.”¹¹ We submit that it is not necessary for John Bolden to serve any custodial time beyond the time that he served during his brief pretrial detention.

IV. CONCLUSION

John Bolden respectfully requests that the Court consider all the information provided as mitigating circumstances and impose a sentence of time served to be followed by a term of supervised release, which would be sufficient but not greater than necessary to achieve the goals of sentencing.

Dated: New York, New York
April 13, 2026

Respectfully submitted,



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Attorney for John Bolden

¹⁰ Timothy Daty, *Family Relationships and the Incarcerated Individual Continued Evidence-Based Education*, University of New Haven, October 12, 2016; <https://www.ebpsociety.org/blog/education/221-family-relationships-incarcerated-individual>

¹¹ Kim Steven Hunt, Ph.D., Robert Dumville, *Recidivism Among Federal Offenders: A Comprehensive Overview*, UNITED STATES SENTENCING COMMISSION (March 2016), pg. 22; https://www.ussc.gov/sites/default/files/pdf/research-and-publications/research-publications/2016/recidivism_overview.pdf