

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
(Miami Division)

CASE NO.: 1:25-cr-20178-ELA-1

UNITED STATES OF AMERICA,
Plaintiff,

v.

GUILLERMO LOPEZ CARRAZANA,
Defendant.

SENTENCING MEMORANDUM

MEMORANDUM OF LAW

The Sentencing Reform Act of 1984 created the U. S. Sentencing Guidelines (“Guidelines”) in which a Federal District Court Judge must consider each of the factors set forth in 18 USC § 3553 (a) when crafting a sentence. However, judges cannot increase sentences beyond the statutory maximum based on their own factual findings. See *Blakely vs. Washington*, 524 US 296, 303-04 (2004); Later the Court more thoroughly remedied the constitutional problem by holding that sentencing courts must consider the guidelines as only “advisory” and that may “tailor their sentence in light of other statutory concerns”. See *United States vs. Booker* 543 US 220, 245-246 (2005). Pursuant to *Booker*, guidelines are no longer mandatory, and the final sentence has to withstand "Reasonableness" review. *Id* 543 US 220, 221; See also *Rita vs. United States*, 551 US 338 (2007); See also *Kimbrough vs. United States*, 552 US 85 (2007); *Gall vs. United States*, 525 US 38 (2007).

The factors the Court must consider in crafting a sentence are:

(1) The nature and circumstances of the offense and the Defendant's history and characteristics (18 USC § 3553(a)(1)).

(2) The general purpose of the Sentencing Reform Act: The need for the sentence imposed to:

(A) Reflect the seriousness of the offense, to promote respect for the law, and to provide just punishment for the offense;

(B) To afford adequate deterrence to criminal conduct;

(C) To protect the public from further crimes of the defendant;

(D) To protect the defendant with needs for educational or vocational training, medical care, or other correctional treatment in the most effective manner (18 USC § 3553(a) (2)).

(3) The kinds of sentences available (18 USC § 3553(a)(3)).

(4) The pertinent policy statements issued by the "U.S Sentencing Commission" (18 USC § 3553(a) (5)).

(5) The need to avoid unwarranted sentences disparities between defendants convicted of similar conduct: (18 USC § 3553 (a)(6)).

(6) The need to provide restitution to any victims (18 USC § 3553(a)(7)).

(7) The applicable sentence range recommended by the "Guidelines" (18 USC § 3553(a) (4)).

Sentencing courts are required to consider the § 3553(a) factors and may not presume that a sentence within the guidelines range is automatically reasonable. *Gall* 128 S.Ct 586,596. But sentencing courts have a great deal of discretion in deciding how the factors apply to the case and in setting a sentence accordingly. See *Gall* 127 S.Ct at 597. Sentencing courts are not required to impose a sentence within the range provided by the "Guidelines. See *Kimbrough* 128 S.Ct at 574-75. *United States vs. Diaz - Arguera*, 447 F.3d 1167 (9th Cir,2006). Everything boils down to the sentencing court imposing a sentence that is both procedurally reasonable and substantive reasonable and according to the § 3553(a) factors, Mr. Lopez Carrazana is asking this Honorable

Court to apply a variance from the federal sentencing guidelines in this case and states as grounds thereof the following:

REQUEST FOR VARIANCE UNDER 18 USC 3553 (a)

Nature and Circumstances of the Offense

The Defendant pled guilty to Count One of a 10 Count Indictment. Count One alleges conspiracy to commit wire fraud in violation of 18 U.S.C. § 1349. The defendant accepted full responsibility for his actions and plead guilty in a speedy fashion.

Both codefendants had their own clients and conducted all contact with those clients. The two codefendants sent out most of the applications already filled out to the Defendant and provided all the false information to the Defendant. These codefendants ultimately paid a portion of their gain to the Defendant. These two codefendants made far more money than the Defendant did. The Defendant almost never interacted with the clients of the codefendants and had no way of knowing how much and if the codefendants got paid. In sum, the codefendants advertised to get clients, controlled all the clients, provided file information, and controlled the payments. They then sent a portion of their profits to the Defendant.

The History and Characteristics of the Defendant

The Defendant is a 33-year-old United States citizen. He first migrated with his family to the United States in 1998 on a lottery visa. Both the Defendant's mother and father, who remain married to-date, reside in Miami, FL. The Defendant also has one full sister, and two half siblings on his father's side, who all reside in Miami, FL as well. The Defendant had a delayed learning disability as a child, which required him to attend speech therapy to learn English as his first language, then Spanish as his second language.

In 2023, the Defendant married his longtime girlfriend, Ariane Lopez, a nurse practitioner, and they had one son. The Defendant holds a Master of Science Degree in Nursing and is currently enrolled in a Doctor of Nursing Practice program online at Western University. He has been employed as a legal nurse consultant for Florida Injury Solutions for over a year. Prior to his employment at Florida Injury Solutions, the Defendant was employed as a nurse since 2021.

The Defendant has a clean criminal record and he was ready to cooperate with the Government right away and was available as a witness against the codefendants. The Defendant is now employed in an unrelated industry and will continue to be a productive member of society.

The Defendant's Family Support

The Defendant remains close to all his family members. His wife is aware of the criminal situation he is currently in, and she remains supportive of him as evidenced by the attached Character Letters. Under all accounts, the defendant is an excellent father.

The Need to Avoid Unwarranted Sentencing Disparities Among Defendants with Similar Records Who Have Been Found Guilty of Similar Conduct

USA v. Heidi Cid, 1:23-cr-20421-AMC-1, the defendant pled guilty to over \$14,500,000 in PPP fraud and was sentenced to two months followed by three years supervised release. She was also charged simultaneously in Case Number 1:23-cr-20422-RNS-1.

Conclusion

Mr. Lopez Carrazana cooperated with the process as best he could, accepted responsibility early on in this case, and pled guilty in a speedy fashion.

WHEREFORE the Defendant, Guillermo Lopez Carrazana, through undersigned counsel respectfully petitions this Honorable Court to apply a variance in this case.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing instrument was e-filed via CM/ECF and furnished to Assistant United States Attorney Roger Cruz at roger.cruz@usdoj.gov on this 10th day of December, 2025.

Respectfully submitted,

By: /s/ Bijan S. Parwaresch
Law Offices of Bijan Parwaresch & Associates
FL Bar No. 127700
407 Lincoln Road, Suite 12-E
Miami Beach, FL. 33139
Tel. 305-505-8858
bijanlaw@aol.com
Attorney for Defendant

CHARACTER REFERENCE LETTER FOR COURT

Miami, December 4th, 2025

Honorable Mr. Ed Artau

U.S. District Judge

To whom it may concern,

My name is Manuel Alvarez, and I am writing on behalf of Mr. Guillermo Lopez, someone I have known for many years and deeply respect. Guillermo is a person of genuine kindness, humility, and strong character. He is always willing to help others and consistently treats people with compassion and respect.

The incident before the Court does not reflect the man I know. Guillermo feels true remorse and understands the seriousness of the situation. I sincerely believe he will learn from this experience and continue striving to be the responsible, caring individual he has always been.

Your Honor, I respectfully ask that you consider the sincerity of his character and the positive impact he has on those around him.

Sincerely,

Manuel Alvarez

1424 NE Miami Pl

Miami, FL 33132

Apt. 3414

manubass901204@gmail.com

CHARACTER REFERENCE LETTER FOR COURT

Miami, December 4th, 2025

Honorable Mr. Ed Artau
U.S. District Judge

To whom it may concern,

I am writing this letter to provide a character reference for Mr. Guillermo Lopez who is scheduled to appear in court on a few days. My name is Alcides Montenegro and I have known Mr. Lopez for 6 years as a friend. Throughout our time as friends together, I have come to know Mr. Lopez as an individual of remarkable integrity and strength of character.

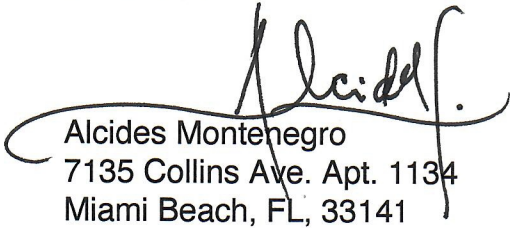
Mr. Lopez has consistently demonstrated a strong commitment to both professional and personal responsibilities. He has not only excelled in his duties but has also positively influenced those around him, often going above and beyond expectations. His dedication and work ethic are truly exemplary, and he has earned the respect of all people surrounding him.

The incident does not reflect Mr. Lopez character. He has always respected the law and others. I believe this is an anomaly in his otherwise responsible conduct. I'm confident he regrets any harm caused and is committed to learning from this experience.

Your Honor, I hope that you will consider my observations during your deliberations. I sincerely believe that Mr. Lopez deserves every opportunity for leniency and the chance to continue making a positive impact on those around him. Thank you for your time and consideration.

Please feel free to contact me via email at alcimonte@yahoo.com should you require any additional information.

Sincerely,



Alcides Montenegro
7135 Collins Ave. Apt. 1134
Miami Beach, FL, 33141

alcimonte@yahoo.com
PH: 305 458 1449

CHARACTER REFERENCE LETTER FOR COURT

December 4th, 2025

Honorable Mr. Ed Artau
U.S. District Judge

To whom it may concern,

My name is Oquel Guerra, and I am writing to offer a character reference for Guillermo López Carrazana, whom I have had the privilege of knowing for 6 years as a friend.

During the time I have known Guillermo, I have come to recognize him as a person of good moral character, integrity, responsibility and care to others.

We met by chance but as soon as I interacted to him, I found out he is a great human being, a person who keeps you happy and cared all the time, even if you just met him.

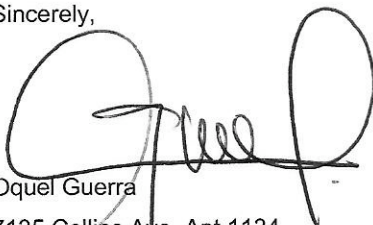
The years passed and, a day after other, we shared memorable moments, we shared passion for music, hobbies and we traveled together several times. In all those moments together, there was no disrespect or any bad behavior at all.

Related to his personal life, in those aspects he shared with me and other friends I can say he has a beautiful relationship with his wife (after a long, long time being her boyfriend). He has always been protective, loving and care with her. Now they are married and have a beautiful kid, to whom I love and see frequently. I can really say, with all respect and because I deeply feel it, that it will be very painful for his wife and son the absence of a husband and father that take care of them the way Guillermo take care of them, and support them the way he does.

In addition to that, I have seen Guillermo working hard like no one else to support his family and even his friends; working all day long if necessary. He is always there anytime you call him or need it. Any person who has been close to Guillermo has felt protection and security, at every moment.

I kindly ask the Court to take these sincere words into consideration, and they help in the best possible way.

Sincerely,



Oquel Guerra

7135 Collins Ave, Apt 1134

Miami Beach, FL 33141

Email: oquel@yahoo.com

Ph: (305) 495 5741

From: Ariane Lopez
601 NE 39 ST, APT 310
Miami, Fl 33137
786-520-1472
aglopez0422@gmail.com

December 4, 2025

To: The Honorable Ed Artau
U.S. District Judge

Re: Character Reference for Guillermo Lopez Carrazana

Your honor:

My name is Ariane Lopez, and I am writing to you as the wife of Guillermo Lopez, a man who is not only my husband, but the emotional and financial foundation of our family. I respectfully ask that you receive this letter with understanding and compassion, as it is written with sincerity, honesty, and deep concern for the wellbeing of our household.

Guillermo is a fundamentally good, kind-hearted, and responsible individual, who consistently demonstrates patience, empathy, and dedication in all aspects of his life. He is a devoted husband and an exceptional father, whose presence is essential to the emotional stability, security, and routine of our home. Each day, he strives to provide for and protect his family, and he does so with humility and unwavering commitment.

Throughout our time together, I have observed Guillermo face challenges with maturity, accept responsibility for his actions, and actively work toward personal growth. He does not avoid accountability; rather, he embraces it. He approaches life with resilience and learns from his mistakes, always prioritizing the wellbeing of his family above all else. His loyalty, integrity, and desire to better himself are qualities that define who he is at his core.

Your Honor, I state sincerely and without exaggeration that our household depends on Guillermo in every meaningful sense - financially, emotionally, and structurally. As our primary provider, he works tirelessly to ensure that our basic needs are met and that our family maintains stability. His absence would place a significant financial burden on our home, jeopardizing our ability to meet essential obligations and maintain the security we currently have. Without him, even temporarily, the foundation that holds our family together would be severely compromised, leaving us vulnerable, overwhelmed, and struggling to maintain the stability that he has worked so hard to build.

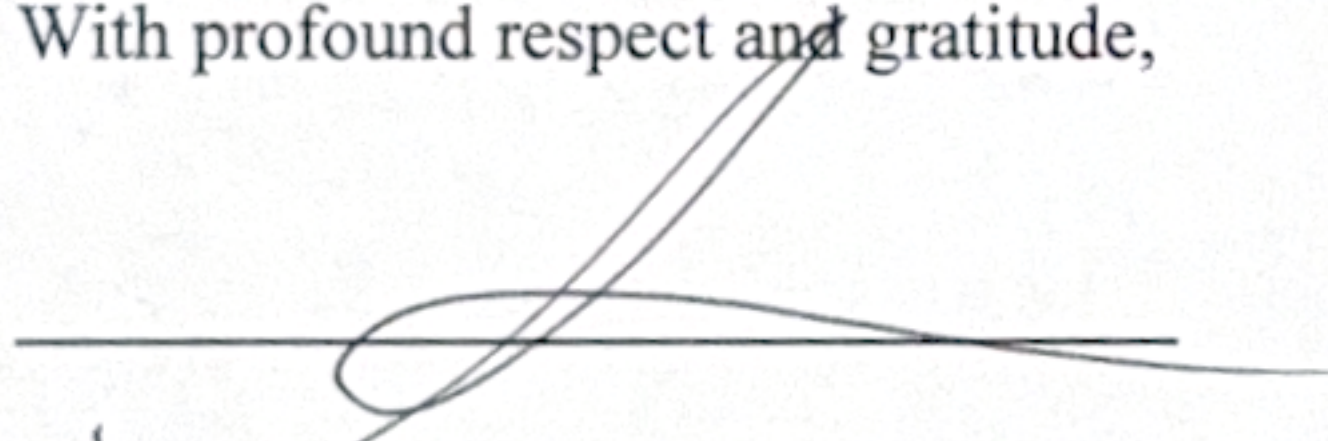
Despite any mistakes he may have made, Guillermo is a man who reflects deeply on his actions and actively seeks to learn from them. He does not dismiss responsibility or minimize

consequences; rather, he embraces them as opportunities for personal growth. He consistently works to evolve into a stronger, wiser, and more grounded individual for himself and for the people who depend on him. He is compassionate, hardworking, and deeply motivated to contribute positively to both society and to the family who loves and depends on him. He is not defined by his shortcomings, but by his character, his actions, and his commitment to growth.

I respectfully ask that the court consider these aspects of Guillermo's character when making decisions in his case. I genuinely believe he poses no threat to society and that he will continue to be a law-abiding, productive, and meaningful member of our community. His continued presence in our home is essential to our family's financial survival, emotional health, and the healthy development of our child. The consequences of his absence would be severe and far-reaching, not just for him, but for all of us.

Thank you, Your Honor, for taking the time to read this letter and for considering my perspective during your deliberations. I remain available to provide any additional information the Court may require.

With profound respect and gratitude,



Ariane Lopez