

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Docket No: CR-07-517M-01
)	
PATRICIA BUCCELLO,)	Hon. Deborah A. Robinson
)	United States Magistrate Judge
Defendant.)	

DEFENDANT’S SENTENCING MEMORANDUM

Defendant, by and through undersigned counsel of record, hereby files electronically the letter that was hand delivered to the Court on January 18, 2008, without the accompanying attachments:

January 18, 2008

Honorable Deborah A. Robinson
Magistrate Judge
U.S. District Court for the District of Columbia
300 Constitution Avenue, NW
Washington, DC 20001

Re: United States v. Patricia Buccello
Docket No. 07-517M-01

Dear Judge Robinson:

This letter is being written in anticipation of the sentencing of my client, Patricia Buccello, which is set on your calendar for next Wednesday, January 23, 2008 and

supplements the Defendant's position as set forth in the pre-sentence report.

Ms. Buccello has pled guilty to a one count information charging her with Theft of Public Money (Misdemeanor) in violation of 18 USC §641. As set forth in the pre-sentence report, the total offense level is 8, and since the defendant has no prior convictions, an advisory guideline imprisonment range is from 0 to 6 months.

This letter, together with the accompanying attachments, is being written in the hope that you will determine, based on Ms. Buccello's lack of prior criminal record and lifetime of commitment to serving the community, that imprisonment would not be appropriate in this matter and that therefore the lower range of the sentencing guideline, 0 months imprisonment, is appropriate in this case.

1. The Plea Agreement

Initially, Ms. Buccello would note that she has complied with all the conditions of the plea agreement. She has resigned from her position as SAC with the National Park Service, and has retired from the Federal Government after a long and distinguished career. In fact, she was forced to take an early retirement, which has had a significant financial impact not only on herself, but also on her family, both now and in the future. She has also paid the special assessment of \$25 owed in the case prior to her sentencing. She has further made full restitution payment totaling \$10,864.95 to the Department of the Interior, of which only a portion is related to the charge in the information, pursuant to the terms of the agreement. Additionally, she has agreed never to apply for or accept a law enforcement job in the future, and can never apply for retired law enforcement credentials.

Moreover, she has taken other steps not specifically set forth in the plea agreement but agreed to by the parties. Specifically, she has relinquished all of the Marriott Points that were credited to her personal account and which were associated with some of her personal credit card activity, and has agreed to donate them to charity.

She has taken full responsibility for her criminal actions, and has even agreed to go above and beyond that admission and repay to the federal government amounts that are clearly not related criminal conduct, but would ordinarily have been handled administratively by an adverse personnel action.

2. The Offense

The offense, a misdemeanor, to which the defendant has pled guilty, is set forth in the government's proffer and is reiterated in the pre sentence investigation report. It is

divided up in to two segments, "Failure to Perform Duties", and "Fraudulently Billed Travel." Ms. Buccello would assert that if the fraudulently billed travel segment of the charges had not occurred, that this matter would not have been handled by a criminal prosecution, and therefore, the court should not consider the "failure to perform duties" as criminal conduct. There is no actual intentional theft implicit in those allegations. In fact the allegations contained in that section seek to cast Ms. Buccello as a negligent employee is contrary to the weight of the evidence regarding her federal career.

In support of Ms. Buccello we have provided numerous letters from co-workers and former supervisors demonstrating that Ms. Buccello is a diligent, innovative, and extremely hard working federal employee who was simply overwhelmed by the hardship of being separated from her husband while simultaneously working in Washington, living in Maine, and traveling extensively throughout the country for the National Park Service.

Importantly, regarding the allegations contained in the "Failure to Perform Duties" section of the charge, as noted at the time of the actual plea soliloquy, Ms. Buccello never obtained a "free airplane ticket" for her own use. If she were awarded a free travel ticket by the airline, she turned it over to the government and never, as implied, attempted to convert it to her own use. The government agreed with this statement at the time of the plea.

Additionally, the failure to perform duties charge specifically denotes Ms. Buccello's failure to attend a particular non-governmental ceremony in Jacksonville, Florida on March 23, 2007 and her failure to provide a fatality report to a widow in St. Louis on July 10, 2006. Both of these incidents centered on the same deceased National Park Service employee, and in regard to this particular officer's death, the government has attempted to paint Ms. Buccello as a callous and uncaring individual. This is not supported by the record of her entire law enforcement career, as the attached letters from numerous surviving families and co workers attest. The letters and show of support demonstrate that Ms. Buccello was a leader, not only among the National Park Service, but among all Department of Interior Agencies, in establishing programs to care for employees and grieving surviving families and co-workers.

The defendant would point out that the death of this particular agent was unique and presented a very specific situation, which we will explain orally at sentencing, and although she does not seek to excuse her conduct, we would stress that it is not criminal and should not be considered as criminal conduct by the court in support of sentencing.

Second, addressing the "Fraudulently Billed Personal Travel," Ms. Buccello has readily admitted to this personal lapse of judgment and mistake, and although she does not seek to excuse this conduct before the court, she can try to explain this aberration in

behavior from years of dedicated and stellar government and community service.

During the time frame relevant to this case, Ms. Buccello was stationed in Maine and was authorized to conduct the duties of National SAC and Medical Standards Program Manager from her home base in Bar Harbor Maine, where her husband David, also a federal employee, is the Chief Park Ranger of Acadia National Park.

For a number of years she had been authorized to travel between Bar Harbor and Washington, D.C. as agreed to by the NPS when she accepted the dual positions, both of which had significant responsibilities. She admits that she knew this changed in February 2005.

Ms. Buccello would note that the first time that the personal travel was billed to her government issued credit card was an absolute mistake, she processed the wrong credit card when buying her ticket. Additionally, the majority of the 9 trips mentioned in this specification, which occurred from April 2005 through February 2007 consist of travel changes charged to her government issued card, not original purchases. The underlying ticket had been bought with her personal credit card and never charged to the government. The changes to the already purchased tickets were almost uniformly made when she had to change her travel plans over a weekend due to duties that had unexpectedly come up at work and kept her from keeping already made reservations. Therefore, she admits that she mistakenly and improperly considered these changes to be work related at the time she made them, thereby charging them to the government. She admits that this was wrong, and has made full restitution to the Department of the Interior, not only for the fraudulently billed travel, but also for the other matters unrelated to the fraudulently billed travel.

Moreover, the trips should also be considered in context. During this time period she traveled to Bar Harbor at a minimum of twice per month-- often more frequently than that. In all that time over a two year period, this amounted to dozens of trips, yet only nine trips include possible changes to travel and in a much smaller number of instances tickets that were charged to the government.

However, this doesn't excuse this conduct. Ms. Buccello is truly remorseful for this indiscretion, has made full restitution and realizes and has owned up to her mistake, she is not claiming innocence, and has not forced the government to prove all the elements of the offense against her.

3. Support from the Law Enforcement and Paramedic Community and Ms. Buccello's Record as a Federal Employee

Ms. Buccello is providing the court with numerous letters from law enforcement professionals, supervisors and co-workers who have known Ms. Buccello both as a paramedic and throughout her federal service career and who support her in this difficult time.

Following are portions and representative highlights of the attached letters of support for Ms. Buccello:

Judith Stolfo. Administrative Law Judge. Social Security Administration. Former Senior Attorney for Dept. Interior.

"Pat helped create a program to set up Medical Standards Program for Law Enforcement Personnel and firefighters in the Dept. Interior... Her service to the National Park Service spared the Department of the Interior millions of dollars in legal liability... Her service, but for this incident, has been superlative." She knows of the travel strains on Pat and indicates that the move to DC was unjustified but that Pat did not complain.

Vicki Minor, Executive Director, Wildland Firefighter Foundation, a non-profit that takes care of fallen or injured wildland firefighters and their families.

She has worked well Pat for several years, stating "Her (Pat's) abilities in helping the family heal have been the best in the business. She showed sincere compassion and concern... If I could appeal to the court for justice for Pat, it would be to go lightly on this woman who has given so much to so many in their darkest hours."

Jack Harris M.Ed. Licensed professional counselor, advisor to numerous state and Federal law enforcement Critical Incident Stress Management Programs.

"I have worked with Pat during some very traumatic times, where employees, coworkers, families and visitors were exposed to significant trauma and stress. She worked tirelessly with Park employees and their families... after Hurricane Marilyn, in New York City after 911, with families of deceased employees... (including) an NPS ranger who was murdered... Again and again I watched Pat go above and beyond to help other people. Her unselfish compassion, dedication and commitment to people in their time of need made a difference to and had a significantly positive impact on many peoples' lives."

Glen R. Anderson. Law Enforcement Specialist, Lake Mead, NV. Longtime friend and colleague.

“Either Pat or I have coordinated and directed all of the line of duty death services since 1990...ensuring that the final remembrances of employees lost in the line of duty were conducted in a dignified manner that honored their services. Pat worked diligently with the National Park Service... and the Department of Justice ensuring that anyone who was entitled to benefits would receive them...Pat made certain (that fallen employees were) properly memorialized...Were it not for her diligent work in this matter, those who made the ultimate sacrifice would remain forgotten.”

Tammy Keller. Law Enforcement Park Ranger, Federal Law Enforcement Training Center.

“She was known to even go beyond what good Rangers do at personal expense. Extra hours, taking leadership roles, mentoring Rangers, CISM (Critical Incident Stress Management) development and training, EMS training, and participating in her community as a Paramedic as well as a Paramedic for the National Park Service. I could fill an entire letter with the extra work Pat has done for the National Park Service...Pat assisted me and other Rangers in tragedies ranging from being involved in extremely dangerous rescues or recoveries to losing a co-worker to a murderous sniper...personal losses in natural disasters to losing a co-worker to suicide...I believe the CISM program has been instrumental in saving many valuable employees from career ending stress related problems...Pat is personally responsible for much of the success of this program...I watched Pat cry with, laugh with, and hold the hands of Mothers and Fathers, Sisters and Brothers of fallen Rangers. Pat gave pieces of herself to everyone she touched and everyone was a better person for it.”

Ken Phillips. Chief of Emergency Services, Grand Canyon National Park, Law Enforcement Park Ranger.

“Pat’s record as a public employee entrusted with law enforcement duties...over three decades has been stellar...(Pat) was working in a high volume law enforcement patrol operation...and was also directly involved in many complex rescues and large-scale emergency incidents...There are countless numbers of park visitors who were aided by Pat’s direct actions and effective decisions at Grand Canyon. Pat’s positive impact on the public and her fellow rangers did not stop when she left Grand Canyon...(she became) directly involved in the development of the (CISM)program...I have personally known rangers who quit working law enforcement, prior to the CISM program, due to the impact of the work stress on their personal lives...I can only assure you that this program has spared many rangers personal suffering...I request that you review Pat’s personal performance and commitment toward law enforcement. The way in which the National

Park Service has chosen to terminate her for this improper act, without any effort made toward rehabilitation, causes one to wonder about the motives of the agency. I believe in being able to forgive someone.”

Terrie Fajardo, Chief, Human Resource Operations (retired), NPS Washington, DC.

“Ms. Buccello’s dedication to her position and to her fellow law enforcement staff proved to be the difference in meeting both the needs of the Agency and the needs of the individual...It took a leader with the humanity to know how difficult the ultimate decision was to accept and the strength to help each person find a way to accept this drastic change...she (Pat) met my every expectation as a leader and as a person.”

Curt Sauer, Superintendent, Joshua Tree National Park, CA.

“...I relied on her...during and after high stress/traumatic rescues involving fatalities and serious injuries...our park experienced the tragic death of five rescuers due to a heli-jet crash...(Pat) arranged for full support of my personnel during the following week of incident debriefing...I do know that for over twenty five years, (Pat) is a person who I could count on, and have counted on in stressful and emotional times. I know of many rangers and other NPS employees who have benefited from her support and tireless, behind the scenes actions. I know (Pat) to be of the highest caliber as a person and employee of the National Park Service.”

Ralph Moore, Superintendent, Katmai National Park, AK. Former law enforcement ranger.

“I have known Pat for 25 years...She has always been an excellent example of professionalism, dedication, commitment, conscientiousness, and compassion.” Mr. Moore joined the CISM program at Pat’s encouragement responding to an employee murder in Yosemite, the Space Shuttle Columbia tragedy, and Hurricane Katrina among others... “In all these incidents, we succeeded because Pat had trained us well, because she was committed to doing whatever it took to get the job done, and she sincerely cared about the survivors and those assisting them...Her legacy is a good one, and many NPS employees who would have burnt out or would have succumbed to too much stress in their jobs and left the agency are still with it today because of the outstanding work she has done for us.”

Joseph Evans, Chief Park Ranger (retired), Rocky Mountain National Park, CO.

“While the current circumstances are not desirable for her, they do not detract from what I know of Ms. Buccello and what she has meant to the National Park Service....I personally witnessed the value of (the CISM program) on the well being of emotionally stressed staff. Ms. Buccello was a driving force behind this program. Ms. Buccello became...responsible for implementing (the medical standards program) across the agency. She brought compassion and common sense... (she) deserves considerable credit for developing...procedures to manage and improve the health of hundreds of Law Enforcement Park Rangers.”

Robert Stinson, Law Enforcement Park Ranger, Saguaro National Park, AZ.

“Pat has proven to be a hardworking and dedicated employee to the National Park Service who made significant contributions to the emergency medical services, critical incident stress program, medical program, and law enforcement fields over the course of her extensive career...One instance of her outstanding work include(s) her leadership role in the aftermath of the murder of U.S. Park Ranger Kris Eggle in the line of duty...in which Pat was involved in all aspects...including critical incident stress debriefings, planning of memorial services as well as the criminal investigation...another instance of Pat’s exceptional efforts was in the ...medical standards program in which Pat’s leadership and management of the program has led it to (be) an important and vital program for (employees) performing public safety functions.”

Lanny Wagner, Bureau of Land Management Law Enforcement Ranger, New Mexico.

“(Pat) was one of the safest officers I worked with and I credit my survival in this career of 25+ years as a federal law enforcement officer...to the skills I learned from Pat. Pat cared so much for her employees that she would often take the lead on many dangerous duties so that if anything did happen, others would have the chance to escape. As an emergency medical professional I learned from Pat that no matter who the patient is they deserve the same level of care. Everyone no matter of economic background, country of origin, or even if they were a suspect got the same quality of treatment...(I) have seen in person Pat’s ability as a paramedic to save peoples lives...I would gladly go through any door on any mission with Pat. She is a leader with integrity and honesty and someone who I believe is one of the good people in this world!”

Karen Frauson, Law Enforcement District Ranger, Grand Teton National Park, WY.

“Pat is a true advocate for victims and survivors...(having) worked closely with Pat on a

full ranger of incidents from many death notifications, extended searches, employee suicides and line of duty deaths...Pat has a wonderful ability...to empathize with victims of crime...natural disasters, families of suicide victims...and personnel killed in the line of duty... (she) has helped hundreds and hundreds of people...right after the terrorist acts of 911..She coordinated a huge effort that involved CISM personnel throughout the country...Pat was a 'rock' for many of us there..She truly cares about those in need and has a huge heart...she will continue to make a positive difference in other people's lives... ”.

Richard Powell, Chief, Risk Management, National Park Service, Washington, DC.

“I am a 41 year career employee of the National Park Service...I have worked with and supervised many NPS personnel...Pat Buccello is among the finest...Pat is foremost an honest and caring person and has represented the NPS and the law enforcement profession with distinction throughout her career...Two outstanding examples of her care and her sensitivity to our employees are the work she has done for the (CISM) and Medical Standards programs...Pat became the model for how the (medical standards)program should be managed to protect the employees as well as the NPS...In my opinion, she stands tall among her peers and is one of the kindest, most honest and dedicated NPS employees I have ever had the privilege of working with.”

Karyl Yeston, Supervisory Park Ranger, Grand Canyon National Park, AZ.

"In all the years that I have worked with her, I have observed that Ms. Buccello always conducted herself with a high level of professionalism...Ms. Buccello was also a leading force in implementing major improvements in the NPS Medical Standards Program, which impacts all employees who perform law enforcement and fire fighting. Her improvements to the program have benefited all of us."

John Patmore, District Law Enforcement Park Ranger, Curecanti, CO.

“(Pat’s) compassion is also evident in her professional life...I have worked with Pat on many tragic incidents in the National Park Service, and she never fails to professionally attend to...duties...she then will go farther, and purposefully attend to the emotional needs of those affected, whether it is employees or families...My wife and I view the recent events which bring Pat before the court as an anomaly...Her actions certainly do not fit in with her long and well defined history of professional service and concern for

others.”

Susan Schwarz, Park Ranger, Sequoia National Park, CA.

“... (after joining the CISM team) I saw just how dedicated Pat could be towards something she believed in... (Pat) was the one person most instrumental in the National Park Service having the CISM program... today... at Sequoia... we had one of our firefighters die in the line of duty... Pat... was assisting the fire fighters family through this ordeal. Her compassion and concern for this family was very evident... I don't know the details of what happened with Pat. I do know that a 30 year stellar career should not be wiped out due to some bad choices.”

Patricia Wands, Park Service firefighter (retired), AZ.

She first met Pat when she was a backcountry ranger at Grand Canyon National Park... “Being a backcountry ranger required strength, courage, knowledge and care for thousands of park visitors and employees. (Pat's) skills were graceful and powerful, always ensuring that the visitor had a positive National Park experience. Pat developed the line-of-duty death response program and supported survivors across the country... It is difficult for some to speak from the heart, but for Pat, her words no doubt come naturally. Pat has always proven to be there for the families and the National Park Service. I witnessed her professionalism... after the violent death of (a park ranger)... and with the family. She was extremely kind and compassionate with the family and the Park employees... The NPS family is losing a fine employee over an offense that is totally out of character for her. Because of Rangers like Patricia Buccello, the National Park Service is a well-loved and cherished organization.”

Pamela McMillan, Coordinator, CISM Program, National Park Service.

“Pat's hard work, dedication, and great compassion for NPS employees are the foundation for why the NPS currently has an active CISM Program... I worked for Pat... in many CISM responses that were Line of Duty Death related... Pat always showed great concern for the family and friends of the deceased – going that extra mile to make sure they were well provided for... she created and formalized the NPS Line of Duty Death response handbook... (which) came from Pat's desire to provide the very best for NPS employees and their families.”

Dan Bahr, Operations Chief/Paramedic, County Ambulance Services, ME.

“(In working with Pat)...there has never been a single occasion that was anything but professional, above board, honest and straightforward. She represents the epitome of the kind of person you would want to walk through your door if you were unconscious at 2:00am. She would guide her crew on how to treat you, she would make sure your pet was safe, and she would make sure your door was locked before they left for the hospital. She has been a strong leader (for the ambulance service)...and the towns...have been very fortunate, indeed, to have her as the service chief...the EMT’s and paramedics of that service have great respect for her leadership and trust her judgement... (she) is a very valuable asset to the EMS community here in Maine...I certainly hope the judge will consider her character and service to the community when deciding her sentence.”

Timothy Clough, Police Officer (retired), Southwest Harbor, ME.

“...In my law enforcement capacity, I have witnessed several times her dedication, professionalism and compassion when treating victims of automobile accidents...drug overdoses, domestic assaults, etc...I hope the court will take into consideration ...the totality of her past work history and her many years of extraordinary dedication to community service which she has demonstrated over and over again.”

Comments from Management and Crew of the Southwest Harbor-Tremont, Maine, Volunteer Ambulance Service of which Pat has been a paramedic and crew chief for many years:

Sonia Field, vice-president of the service: *“The communities...have benefited greatly from (Pat’s) presence as crew chief and paramedic...It would be an immense loss for all if this were to change...I have found her to be an honorable person...I believe Pat is irreplaceable.”*

Jerry Walls, volunteer, retired US State Dept: *“I have observed her professionalism as a paramedic under many levels of stress...I have full confidence in her professional and personal qualities.”*

Dwayne Pinette, Paramedic/Firefighter: *“(Pat) is a wonderful person, proficient crew chief, great Paramedic, and a person whom I respect.”*

Jim Keene, President of the service, volunteer: *“We all hold Pat in highest respect and affection...I...am glad to vouch for her good character.”*

Susan Clarke, EMT: *“I have had many crew chiefs...none as good as Pat*

Buccello...through her caring, professional determination she has increased the stature of the service. I know Pat to be a loyal, highly intelligent, straightforward, respectable and thoughtful friend and co-worker.”

Elliott Spiker, volunteer, retired Department of Interior: “ *Pat has always acted in a totally professional, disciplined manner, exercising her fair-minded leadership with impeccable integrity.”*

Maurice Marshall, EMT and past service President: “ *...she has provided mentoring...and has been very supportive and caring in the aftermath of multiple trauma or DOA calls. Our crewmembers look upon Pat as not only a reliable EMS colleague, but also as a trusted friend in tough times.”*

David & Heather Dostie, Paramedics: “*(Pat) has always been a person of unquestioned character, always completely honest, loyal and supportive on both a personal and professional level...always leading by example and setting a high bar of excellence rarely seen in other EMS services...she is a great mentor and an outstanding role model for new Paramedics... We trust her implicitly, which in this field is the ultimate complement...Her service is vital for the continued health of the communities...Please let her continue her great work.”*

David Robertson, EMT-Intermediate, training officer: *Pat Buccello has continually provided compassionate care for all her patients...providing our small towns with a very high level of care...she has done all this for us in her spare time and on weekends...the Pat Buccello that I know and work with is a very dedicated, caring person.”*

Dalen Mills, volunteer, US Coast Guard retired: “ *I support Pat Buccello as our crew chief...we are blessed to have the abilities that she brings to our service...I certainly realize that she has had some glitches recently, but I also believe that the service is getting a better person to be the crew chief because of her travails...I look forward to her leadership... ”*

Additionally, we are providing the Court with select examples, which are in no way exhaustive, of Ms. Buccello’s commendations throughout the years and which more than anything, serve to prove her dedication as a federal employee and proud member of the National Park Service. Some of the actual representative awards are attached to this letter.

Outstanding Federal Law Enforcement Employee Award, April 27, 2007
(nomination by Lane Baker, Deputy Chief, Law Enforcement, Security, and Emergency Services) "...Pat's portfolio of completed cases is vast and literally spans the United States...Her nearly 30 year history is remarkable...Her support, performance, and leadership will be missed."

Women in Federal Law Enforcement, Julie Cross Memorial Award Nomination, April, 1995 (nomination by Richard Gale, Deputy Chief Ranger, Washington, DC) "...Special Agent Buccello has clearly sustained a superior level of performance...she was the first female to be hired to a regular patrol position...Supervisors have recognized her skills in law enforcement leadership and she has been the first female hired in every position she has held...Throughout her career, Ms. Buccello has provided a mentoring role to other women...The diversity of (Pat's) law enforcement ...include(s) her role, since 1993 as a key member of a multi-agency task force involved in the investigation of radical right-wing groups...Her willingness to pursue investigation of perpetrators of hate crime is to be commended."

Outstanding EMS Performance, September, 2007 "...She has dedicated years to giving her best and inspiring and mentoring others to do the same for EMS in her community."

EMT of the Year, September, 2001 "...Simply put, patients trust her, the medical staff trusts her. We can count on her to do what needs to be done, to do it well, and to know her limitations in doing so...many times under less than ideal conditions, for her patients. I don't think you could ask for anything better."

Star Award, January, 2007

Quality Step Increase, October, 2006

Star Award, October, 2004

Outstanding Performance Recognition, Yellowstone Fires, September, 1998_

Star Award, November, 1997

Quality Performance Award, January, 1994

Quality Performance Award, November, 1994

Quality Performance Award, September, 1993

Superior Performance Incident Rating, Hurricane Andrew, September, 1992

Special Achievement Award, April, 1991

Eagle Award, December, 1989

Performance Award, August 1989

Special Achievement Award, September, 1984

Commendation for Bravery, May, 1984 (Regional Director, Howard Chapman)

“The platform (at the edge of the Grand Canyon) was approximately five feet square, with a near vertical drop of approximately 150 feet on three sides. You were able to restrain the visitor and stop her suicide attempt...your prompt response to this emergency are in keeping with the highest ideals of the National Park Service.”

We are also providing representative select letters which demonstrate a history of compassionate care for co-workers and families of fatality (including homicides & employee suicides) victims documented in numerous letters.

We are also attaching some representative commendations and thanks for teaching at academies, parks and other agencies.

Finally, we are attaching a number of “thank you” letters from patients Pat has rescued or treated in the national parks. As with the other attachments, these are not exhaustive and literally dozens of pages of other documents will be brought to court to demonstrate the support that Ms. Buccello has in the community at large.

It is sincerely hoped that the Court will take all of this information into consideration at the time of sentencing, and compassionately understand that the defendant’s criminal

conduct in this case is truly an aberration. We hope that after considering all of the good that she has done for the community, and after reviewing the pre-sentence report that Ms. Buccello will be sentenced to a period of probation.

Respectfully,

Michael L. Spekter
MLS:st

CERTIFICATE OF SERVICE

I hereby Certify that I have caused a copy of the foregoing Defendant's sentencing memorandum to be served by hand with attachments on January 18, 2008 , and electronically, without attachments, on the following individuals this date.

Ronald Sharpe, Esq.
Assistant United States Attorney
District of Columbia
555 4th Street, NW
Washington, DC 20001

Michael L. Spekter