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7 Attorney for Defendant
8 ANTONIO MARIOT WILSON

9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 UNITED STATES OF AMERICA,) CASE NO. CR 20-201-SVW
12)
13 Plaintiff,) **DEFENDANT’S SENTENCING**
14 vs.) **MEMORANDUM**
15) Hearing Date: January 28, 2021
16 ANTONIO MARIOT WILSON,) Time: 11:00 a.m.
17 Defendant.) Location: Courtroom of the Hon.
18) Stephen V. Wilson
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21 Defendant Antonio Mariot Wilson (“Defendant”), by and through his counsel of
22 record, Jeffery L. Greco, of Greco Neyland, P.C., hereby submits his position regarding
23 sentencing factors to be considered by the Court in determining his proper and just
24 sentence and the Court’s use of information contained in the presentence report (Dkt.

25 No. 21):

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I.

HISTORY OF CASE

On June 24, 2020 Antonio Mariot Wilson pled guilty to a single count information admitting to participating in a scheme to commit wire fraud in violation of 18 U.S.C. §1343.

The presentence report calculates a base offense level of 7 pursuant to USSG § 2B1.1(a)(1), and a 12-level enhancement for loss greater than \$250,000 and up to \$550,000 for pursuant to USSG § 2B1.1(b)(1)(G). In this case, the undisputed intended loss was \$347,000, while the actual loss amount was \$272,000, after Mr. Wilson returned \$75,000 to one of the named victims (see *PSR* p. 7, § 20). After acceptance of responsibility and a timely plea, an additional three (3) points were deducted, thus bringing the total adjusted offense level to 16.

Further, the presentence report finds Mr. Wilson has a criminal history category of III with a corresponding guideline sentence of 27-33 months. The U.S. Probation Office in its January 20, 2021 letter of recommendation (Dkt. # 33) indicated they are recommending a sentence of 30 months and restitution in the amount of \$272,000.

The government in its sentencing position paper (Dkt. 28) agrees with Probation regarding the offense level and criminal history category calculations. The government, however, seeks a sentence at the top of the guideline range at 33 months.

The defense does not agree with the sentencing recommendations.

1 II.
2 ARGUMENT

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4 A. APPLICABLE SENTENCING LAW

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6 Under the Supreme Court’s decision in *United States v. Booker*, 543 U.S. 220
7 (2005), the applicable statute governing federal sentencing, 18 U.S.C. § 3553(a),
8 requires a sentencing court to consider the sentencing Guidelines but it permits the court
9 to tailor the sentence in light of other statutory concerns as well. See *Booker*, id. At 264.
10 Judges must still consider the sentencing range contained in the Guidelines, but that
11 range is now nothing more than a suggestion that may or may not be persuasive to a
12 judge when weighed against the numerous other considerations listed in 18 U.S.C. §
13 3553(a). Id. At 300.

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16 More recently than *Booker*, the Supreme Court has opined that “Guidelines are
17 only one of the factors to consider when imposing sentence.” *Gall v. United States*, 552
18 U.S. 38, 128 S. Ct. 586, 602 (2007). These Guidelines, although “formerly mandatory,
19 now serve as one factor among several courts must consider in determining an
20 appropriate sentence.” *Kimbrough v. United States*, 552 U.S. 85 (2007). The statute, as
21 modified by *Booker*, contains an overarching provision instructing district courts to
22 “impose a sentence sufficient, but not greater than necessary, to achieve the goals of
23 sentencing.” See *Booker* 543 U.S. at 300.
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1 Section 3553(a) lists factors that shall be considered before imposing a sentence.
2 The statute mandates the court to impose a sentence sufficient, but not greater than
3 necessary to comply with the purposes set forth in paragraph (2). Section 3553(a)(2)
4 states that the purposes are:
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- 6 (A) to reflect the seriousness of the offense, to promote respect for the law
7 and to provide just punishment for the offense;
- 8 (B) to afford adequate deterrence to criminal conduct;
- 9 (C) to protect the public from further crimes of the defendant; and
- 10 (D) to provide the defendant with needed educational or vocational training,
11 medical care, or other correctional treatment in the most effective manner.
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17 It should be noted, however, in applying this section that 18 U.S.C. § 3582 states
18 that, “imprisonment is not an appropriate means of promoting correction and
19 rehabilitation.”
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21 In determining the appropriate sentence, the Court is to consider, among other
22 things, the nature and circumstances of the offense; defendant’s history and
23 characteristics; the need for the sentence to reflect the seriousness of the offense, to
24 promote respect for the law and to provide just punishments; the need for the sentence
25 to afford adequate deterrence and to protect the public from further crimes of the
26 defendant; and the need to avoid unnecessary sentencing disparities. See 18 U.S.C.
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1 3555(a). Nearly 15 years after the United States Supreme Court decision in *Booker*, it is
2 now, without a doubt clear, that the Guidelines are guidelines and serve truly as
3 “advisory”. In fact, the Guidelines are no longer “the only consideration” at sentencing.
4
5 *Gall v. United States*, 522 U.S. 38, 49 (2007). Rather, it provides or serves as the
6 “starting point” for sentencing consideration by the Court. *Cunningham v. California*,
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8 549 U.S. 270 (2007). The Court is to impose a sentence based on an individualized
9 assessment based on the facts and need not find extraordinary circumstances to justify a
10 sentence outside the Guidelines. *Id.* 47.

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13 B. 18 U.S.C. § 3553(a) FACTORS
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15 Section § 3553(a) requires district courts to impose a sentence “sufficient but not
16 greater than necessary” to comply with the four (4) purposes of sentencing. These are
17 set forth in § 3553(a)(2): retribution, deterrence, incapacitation, and rehabilitation.
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19 The Defendant requests that this Court impose a more lenient sentence than that
20 recommended by the Guidelines, based on factors enumerated in § 3553(a).
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- 22 1. The nature of the offense;
- 23 2. The circumstance of the offense and the history and characteristics of the
24 defendant; and
- 25 3. The need to protect the public and afford adequate deterrence.
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27 Based on these factors, the Supreme Court’s decisions in *Gall* and *Cunningham*
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1 Significantly broaden the discretion of the courts to impose a less stringent sentence that
2 those suggested by Guidelines, in the case at bar, where the Defendant has plead guilty
3 and accepted responsibility to the single count charge in the Information, the Court
4 should exercise its broad discretion to impose a sentence below the guidelines. Mr.
5 Wilson respectfully requests that this Court sentence him to twelve months' of home
6 detention, as well as mandating full payment of the requested restitution in the amount
7 of \$272,000.00. The Defense believes that such a sentence will accurately reflect the
8 sentencing goals the Court should consider pursuant to 18 U.S.C. § 3553, and that such
9 a sentence would be sufficient to punish the defendant for his criminal conduct.
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13 14 C. NATURE OF THE OFFENSE 15

16 As set forth in the factual basis of the plea agreement, Mr. Wilson admits that his
17 18 U.S.C. § 1343 violation stems from his involvement with a company he formed,
18 named "2nd Life".
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20 2nd Life was envisioned initially as a software program that would help people
21 who qualified for government housing and other intended government benefits to be
22 able to apply online through an animated program. This program would be offered to
23 the public for a cost of \$3.99, which, when paid through the website, would give them
24 access to an animated video showcasing for them in great detail how they could apply
25 for the government benefits they qualify for.
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1 Mr. Wilson was one of 4 children born to Yvetta Jean Wilson. Mr. Wilson's
2 biological father was never in the picture, so for a while it was just Mr. Wilson's mom
3 raising the children by herself. When Mr. Wilson was 10 years old, his Mom married a
4 man by the name of Samuel Martin. Mr. Martin was a sexual predator who began
5 sexually molesting all of Mr. Wilson's sisters. He knew about it, but he was just a young
6 child unable to do anything about it. When it was finally brought to light several years
7 later his Mom kicked Sammy out of the house and they were safe once again. However
8 she was back to being a single mother again, and poverty was a lesson they were all too
9 familiar with. Ms. Wilson remarried a man named Richard Ruff when Mr. Wilson was
10 in high school. He did not abuse the kids like Samuel did, but he bore a striking physical
11 resemblance to Samuel and it continually triggered too much trauma in two of his
12 sisters, so one of them ran away from home and the other left home as soon as she
13 graduated from high school and got married just to get out of the house lest she become
14 a victim all over again. Mr. Wilson was determined to never allow someone to be
15 physically hurt like that in front of his eyes ever again, so he joined the US Navy after
16 graduating from high school. He served in the United States' Navy for a period of
17 twelve (12) years before he was honorably discharged. While Mr. Wilson had been
18 successful in the Navy, he found that life outside of the armed services was very
19 different than life in the Navy, and he struggled.

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27 Now married with kids, Mr. Wilson found himself homeless and living in his car
28 with his wife and 2 kids. It was a very demoralizing period in his life. He had to fight

1 with other homeless people just to protect his family as he was once unable to do for his
2 sisters. Mr. Wilson vowed to get his family off the streets and into stable housing, safe
3 from the dangers of a life on the streets.
4

5 Mr. Wilson knew from his own personal experience just how difficult navigating
6 these governmental programs could be. He wanted to simplify the process so people
7 who needed the benefits could take full advantage of the programs that are offered.
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9 To further advance this company, which was still in an embryonic stage, Mr.
10 Wilson consulted with, and hired attorney Ross Meador of the law firm CKR Law. The
11 purpose of this engagement was for 2nd Life to be formed as a Delaware Corporation.
12

13 Mr. Meador's practice focuses on privately held companies and entrepreneurial
14 ventures. According to his current website, "He has negotiated and drafted hundreds of
15 business agreements, and advises clients on business models, financing issues, strategic
16 relationships, and the protection and licensing of intellectual property."
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18 (meenlegal.com/about)
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20 Mr. Wilson was advised accordingly, and he began to incorporate and follow the
21 proper protocol, or so he thought, in order to issue shares, and convertible notes, to
22 angel investors.
23

24 Auna Harris – Investor # 1

25 Ms. Harris was the first person that invested any money with Mr. Wilson in 2nd
26 Life. Mr. Wilson had been acquainted with Ms. Harris for many years prior to her ever
27 getting involved with 2nd Life. Ms. Harris and Mr. Wilson were members at the same
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1 church before he was sentenced to prison in the 2010 case out of the Northern District
2 of California. When he was released from prison Ms. Harris wanted to help Mr. Wilson
3 get back on his feet. Ms. Harris was aware of Mr. Wilson's involvement in ministry and
4 considered the two of them friends. Over a period of time, Ms. Harris gave Mr. Wilson
5 \$72,000.00. Mr. Wilson agreed to make Ms. Harris a partner in any venture he had, and
6 they would split the profits 50/50. Sometime in 2017, Ms. Harris discovered the Jenifer
7 Lewis allegations online. Ms. Harris worked in some capacity in law enforcement at the
8 time, and she became very upset that Mr. Wilson did not tell her about the issues he was
9 having in the media/press with Ms. Lewis. This was the last time Mr. Wilson and Ms.
10 Harris ever spoke.

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15 Arda Hagopian – 2nd Investor

16 Mr. Wilson was told about ways to crowdsource funds for start-ups, and he was
17 told to look into Bumble Bizz. Bumble first made waves as the first dating app that was
18 geared toward women in mind. The traditional Bumble app allows women to make the
19 first move when looking online for a date. Bumble Bizz, on the other hand, was a
20 completely different “swiping experience”. Designed to be a hybrid of Bumble and
21 LinkedIn, it was launched in 2016. Here, women were allowed to decide which, if any,
22 men/women they connected with on a professional networking level. It was here that
23 Ms. Hagopian “swiped right” on Mr. Wilson and connected with him.

24 Ms. Hagopian initially gave him a check for \$100,000 and then immediately
25 wrote him another check for \$50,000 in the same day, as she wanted to be more heavily
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1 involved in 2nd Life. Mr. Wilson gave her a convertible note for the \$150,000 in
2 exchange for a 30% equity stake in 2nd Life.
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4 Jenifer Lewis – Investor # 3

5 Mr. Wilson met Hollywood actress, Jenifer Lewis, at L.A. Fitness. At the time
6 Mr. Wilson was a training director at the gym. Ms. Lewis and Mr. Wilson became
7 friends as he was training her for a period of time. They got to know each other on a
8 personal level, and she discovered that he was involved in writing ministry books and
9 also that he had a company he was trying to launch in his spare time. Ms. Lewis is the
10 only victim of the four (4) named victims that was not given any investor paperwork.
11 Ms. Lewis wrote a check to Mr. Wilson in the amount of \$50,000 and in the memo line,
12 she indicated it was a “Gift”. The true and exact nature of their relationship is not
13 known, as each side tells a different account. What is undisputed is that at some point
14 Ms. Lewis discovered that Mr. Wilson was an ex-convict who had served time in prison.
15 Ms. Lewis contacted Mr. Wilson and told him to never contact her again. She then
16 immediately reported Mr. Wilson to his employer and eventually had him fired from his
17 job at L.A. Fitness. Subsequent to this, Ms. Lewis began doing media interviews and
18 posting about this incident with Mr. Wilson all-over social media. It became very
19 newsworthy as Ms. Lewis was a star on the sitcom, “Blackish”. Ms. Lewis ultimately
20 ended up filing a lawsuit against both Mr. Wilson as well as L.A. Fitness.
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1 Shelley Klipp – Investor # 4

2 Mr. Wilson subsequently met Shelly Klipp likewise, on Bumble Bizz. When they
3 met, as with Ms. Hagopian, Mr. Wilson informed her of his company, 2nd Life. After
4 learning about it and speaking with Mr. Wilson, Ms. Klipp gave him a check for
5 \$75,000. In exchange, she was given a convertible note, albeit though with a lower
6 amount of equity compared to Ms. Hagopian. However, just two days later Ms. Klipp's
7 son performed a Google search on Mr. Wilson and she discovered a myriad of online
8 videos and press clippings related to Mr. Wilson and Jenifer Lewis. As a result of this
9 discovery, Ms. Klipp contacted Mr. Wilson two days after giving him \$75,000 and she
10 demanded her money back. Mr. Wilson complied with her demand and returned every
11 dollar back to her the same day.

12 In total, Mr. Wilson accepted \$347,000 in funds from the four named victims. He
13 repaid Ms. Klipp the \$75,000 that she gave him, so he still owes \$272,000 in restitution
14 to the three remaining victims.

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21 **D. OFFENSE CHARACTERISTICS AND**
22 **CIRCUMSTANCES OF DEFENDANT**
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24 There is no disputing that Mr. Wilson has a checkered past. A simple Google
25 search will yield a number of articles or news' clips about something Mr. Wilson was
26 involved in at some point in his adult life. However, Mr. Wilson, while clearly painted
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1 as a “predator” (see Dkt. 28, p. 3), is far from the predator that the government has
2 painted him out to be.

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4 Mr. Wilson had every intention in making 2nd Life a real product. In fact as I
5 write this position paper now, 2nd Life exists and is live online (<https://a2nd.life>). This
6 was not a trojan horse used to pilfer money from unsuspecting females. Mr. Wilson
7 used a professional platform to meet other business-minded people. He was not upfront
8 with three of the victims about his criminal history, and he did not disclose what he was
9 doing with those funds he took from them when he used them to pay for his personal
10 living expenses. He knows that was wrong and he will pay for it. However, I think there
11 is a lot to be said for someone who does something like this. Most of the time you see a
12 person who is fueled by greed and a need to live a lavish lifestyle. People like Ken Lay,
13 former CEO of Enron, and Dennis Kozlowski, former CEO of Tyco Corp., just to name
14 a couple more infamous examples. These people gutted the finances of entire companies
15 to the tune of hundreds of millions of dollars. Why? Because they could and more
16 importantly, because there was no item in the world they could not buy and that lifestyle
17 where everything has a price and you can buy the world also manifested itself as a
18 compulsion to always need and want “more”.
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21 On the flip side, there are individuals like Mr. Wilson. He is far from living the jet
22 setting lifestyles of Ken Lay and Dennis Kozlowski. Mr. Wilson’s crimes were done for
23 one reason and one reason alone – so that his family could live under a roof and no
24 longer on the streets. Luckily, I have been fortunate in my life that I don’t know what
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1 living in a car with my wife and kids is like. I honestly have no idea what exactly that
2 would do to a man's psyche. Mr. Wilson tolerated it for two whole years. Finally, he
3 was sitting on a bank account with over \$200,000 in it. He was sleeping in a homeless
4 shelter. It's easy to surmise how someone in such a situation could justify their actions
5 by using some of that money to pay for living expenses for his family who was
6 homeless. It is hard to imagine that many would not have done the same thing if faced
7 with similar circumstances, and nowhere else to turn. There is little doubt this financial
8 stress affected his mental state and wellbeing, which in turn compromised his decision
9 making. None of this is mentioned to excuse his conduct, but rather to highlight that his
10 conduct was not borne out of greed or material wants, but rather to protect his family
11 and his kids, something he was unable to do for his sisters when he was a child.

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16 As Mr. Wilson never sought treatment for the severe mental trauma he was a
17 victim of, there is no telling just how much damage was done to Mr. Wilson mentally
18 that may have been a catalyst for his prior crimes, as well as the instant offense.

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20 Mr. Wilson first became aware that he was under investigation when he received
21 the DOJ Target letter dated, April 17, 2020. He immediately arranged to surrender
22 himself and has been on bond since June 11, 2020. Mr. Wilson has fully cooperated
23 with pre-trial since his release in June. Unfortunately, as a result of Covid-19, Mr.
24 Wilson has not been able to maintain employment, and as a result he does not have
25 money to tender at sentencing toward the restitution that is owed. Nonetheless, Mr.
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1 Wilson fully accepts responsibility for this crime and will pay the entire sum of
2 \$272,000 when he is able to work again.
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4 As evidenced by the letters accompanying this memorandum, those who know
5 the real Antonio Wilson, love him dearly. That’s the person he is. He is the very
6 embodiment of everything that everyone wrote about him. He is a wonderful father to
7
8 Bailey and Jordan. They adore their father and love him despite his shortcomings. They
9 know him to be a good man at heart and they know he will always be there for them.

10 Mr. Wilson’s wife, Carolyn, describes her marriage to him as nothing short of
11 amazing since they married in 1998. To read these letters you get a sense that maybe,
12 just maybe, Mr. Wilson really does embody everything those who know him best say
13 that is he. It is often hard to reconcile something like that when you hear evidence of
14 someone who appeared to prey on others for financial gain. It causes you to pause and
15 naturally wonder, “am I just another victim of his cons”. The answer to that lies in what
16 he holds closest to his heart – his wife and kids. It is incongruent to be the predator the
17 government labels him as and yet be a man of faith that is the rock his family stands
18 upon. I suspect and fervently believe that his desire to keep his family safe and cared for
19 played a major role in this. That, along with his past trauma that went untreated for
20 decades, both as a child as well as the PTSD he suffered from being in the military,
21 were likely contributing factors to what led Mr. Wilson to make these poor decisions in
22 the first place.
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1 E. NEED TO PROTECT PUBLIC AND
2 AFFORD ADEQUATE DETERRENCE
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4 A guideline sentence for Mr. Wilson would be needlessly and overly punitive,
5 and would not appropriately serve the goals of sentencing. It would also be
6 counterproductive, both for Mr. Wilson and for society, as a guideline sentence would
7 make it far more difficult for him to re-adjust to the “real world” upon his release.
8 Instead, home detention, and/or probation would ensure that Mr. Wilson is supervised
9 while permitting him to earn an honest living and to provide for his family while
10 making restitution payments.
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14 Beginning the middle part of the last century, an enthusiasm for harsher
15 punishment and longer periods of incarceration began to pervade the public discourse.
16 The policy choices that resulted have created an unparalleled rate of incarceration-
17 nearly 2.23 million people, or one out of every 100 adults, are currently imprisoned in
18 the United States. This is a distinct departure from the nation's historical experience as
19 well as the modern experience of peer democracies. Dept. of Justice, Bureau of Justice
20 Statistics, L. Glaze & E. Herberman, Correctional Populations in the United States,
21 2012, at 3 (2013), <http://www.bjs.gov/content/pub/pdf/cpus12.pdf>. The United States
22 now holds the highest prison population rate in the world, over 5 to 10 times more than
23 western European democracies. Int'l Ctr. for Prison Studies, R. Walmsley, World Prison
24 Population List 1-3 (10th ed.2013). Though home to only five percent of the world's
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1 population, the United States accounts for nearly twenty-five percent of its prisoners.
2 Congressional Research Service, S. Kirchhoff, Economic Impacts of Prison Growth
3 (2010), [http:// fas.org/sgp/crs/misc/R41177.pdf](http://fas.org/sgp/crs/misc/R41177.pdf).
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6 As recognized by Judge Davis, along with many other jurists and experts, "[b]y
7 all accounts, these 'tough on crime' policies have been an abject failure. A rapidly
8 accumulating group of multidisciplinary research studies have come to the conclusion
9 that the rate of incarceration in the United States needs to be significantly reduced, and
10 both the executive and legislative branches seem to agree." United States v.
11 Valdovinos , No. 13-4768760 (slip op. July 25, 2014) (Davis, J., dissenting).
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14 This change in course has been partially brought about by the strain these policies
15 have caused taxpayers. On average, each prisoner costs taxpayers more than thirty
16 thousand dollars annually. Studies published by the Brookings Institute have shown that
17 corrections expenses total \$80 billion per year; and this amount soars to \$260 billion
18 once police, judicial, and legal services are included. The Hamilton Project, M.
19 Kearney, et al., Ten Economic Facts about Crime and Incarceration in the United States
20 (2014), <http://www.brookings.edu/research/reports/2014/05/10-crime-facts>.
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24 While Mr. Wilson has been arrested numerous times, these arrests must be
25 considered in conjunction with the fact that Mr. Wilson had a very terrible childhood.
26 The fact that Mr. Wilson's mother was, sadly, incapable of protecting her children from
27 a sexual predator who abused all of his sisters cannot be overstated. Additionally, Mr.
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1 Wilson’s mother essentially abandoned him and his sisters once she remarried and had
2 another child, opting to insulate herself with her new family and get rid of the children
3 that were no longer wanted. Moreover, and as noted above, Mr. Wilson is in very poor
4 health currently. He is currently suffering from type II diabetes, benign prostatic
5 hyperplasia with incomplete bladder emptying, SVT (supraventricular tachycardia)
6 elevated cholesterol, CKD (chronic kidney disease), and acute renal failure. (*See Wilson*
7 *Medical Records*). With the Covid-19 pandemic still in full swing, any prison sentence
8 for someone with Mr. Wilson’s medical condition can potentially become a life
9 sentence if he contracts Covid-19 while incarcerated.
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14 In fact, since his arrest in this case Mr. Wilson has focused on staying out of
15 trouble and focusing on the personal relationships which matter so much to him. Indeed,
16 Mr. Wilson has certainly been deterred enough through this arrest, and all he stands to
17 lose due to his incarceration, including the loss of his own life. In terms of general
18 deterrence, Mr. Wilson’s plight serves as a cautionary tale to those who have access to
19 the internet and can see what happened to the “guy who conned Blackish actor, Jenifer
20 Lewis,” thereby deterring them from going down the wayward path Mr. Wilson
21 wandered.
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25 F. CONCLUSION

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27 On behalf of Mr. Wilson, counsel respectfully asks this Honorable Court to
28 sentence him to twelve (12) months of home detention where he can work and provide

1 for his wife and children. Although this sentence is below the guidelines, imposing a
2 sentence below the guidelines is appropriate in this case because of the Defendant's
3 acceptance of guilt as reflected in his plea agreement, taking full responsibility for his
4 past actions, remorse for his conduct and agreement to pay the full restitution amount of
5 \$272,000. A sentence such as this will accurately reflect the sentencing goals the Court
6 should consider pursuant to 18 U.S.C. § 3553(a) and that such a sentence would be
7 appropriate and sufficient to punish the defendant for his conduct, but not greater than
8 necessary to protect the public interests in incapacitation, retribution and deterrence.
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12 Alternatively, should the Court deem it appropriate to impose incarceration
13 instead, Mr. Wilson would respectfully ask that the Court impose a sentence of a year
14 and a day, and recommend that he be designated to a Southern California Facility.
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18 Dated: January 21, 2021

Respectfully Submitted,

19
20 /s/ Jeffery Greco

21 Jeffery L. Greco
22 Greco Neyland, P.C.
23 Attorneys for Defendant Antonio Wilson
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