

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO. 20-CR-20163-SCOLA**

**UNITED STATES OF AMERICA**

**vs.**

**CARLOS ENRIQUE URBANO FERMIN,**

**Defendant.**

---

**MOTION FOR REDUCTION OF SENTENCE  
PURSUANT TO U.S.S.G. § 5K1.1**

Pursuant to United States Sentencing Guideline Section 5K1.1 and Title 18, United States Code, Section 3553(e), the United States of America, by and through the undersigned Assistant United States Attorney, hereby moves for a downward departure from Carlos Enrique Urbano Fermin's advisory sentencing range under the United States Sentencing Guidelines, in order to reflect his substantial assistance in the prosecution of others. In support of this motion, the Government states the following:

1. On April 19, 2021, the defendant pled guilty to one count of conspiracy to commit an offense, in violation of Title 18, United States Code, Section 371.
2. The defendant has provided substantial assistance to the government in the investigation and prosecution of others who have committed crimes against the United States.
3. At the sentencing hearing scheduled for May 23, 2022, the United States will provide the Court with further information regarding the nature and quality of the defendant's cooperation and make a specific recommendation regarding an appropriate sentence reduction.

WHEREFORE, the United States respectfully requests this Honorable Court to grant this motion for reduction of sentence pursuant to United States Sentencing Guideline 5K1.1, following a hearing on this matter.

Respectfully submitted,

JUAN ANTONIO GONZALEZ  
UNITED STATES ATTORNEY

By: s/Michael N. Berger  
MICHAEL N. BERGER  
ASSISTANT UNITED STATES ATTORNEY  
Court No. A5501557  
99 NE 4th Street  
Miami, Florida 33132  
Tel: 305-961-9445  
E-mail: [Michael.berger2@usdoj.gov](mailto:Michael.berger2@usdoj.gov)

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing was electronically filed with the Court's CM/ECF system on May 20, 2022:

By: /s/ Michael N. Berger  
Assistant United States Attorney