

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

UNITED STATES OF AMERICA

CRIM NO. 3:19CR181 (JBA)

v.

EDWARD THIESSEN

March 11, 2020

GOVERNMENT'S MOTION FOR DOWNWARD DEPARTURE

Pursuant to Section 5K1.1 of the Sentencing Guidelines, the United States moves the Court to depart downward from the defendant's guidelines as calculated in the Presentence Investigation Report, because the defendant has provided substantial assistance in the investigation or prosecution of other persons who have committed offenses.

The grounds that support the granting of this motion are set forth in the Government's Memorandum in Support of Motion for Downward Departure and In Aid of Sentencing.

Respectfully Submitted,

ROBERT ZINK
CHIEF, FRAUD SECTION
Criminal Division
United States Department of Justice

JOHN H. DURHAM
UNITED STATES ATTORNEY
District of Connecticut

/s/

/s/

DANIEL S. KAHN
SENIOR DEPUTY CHIEF
LORINDA LARYEA
ASSISTANT CHIEF
Fraud Section, Criminal Division
U.S. Department of Justice
1400 New York Avenue, N.W.
Washington, D.C. 20005
Tel. (202) 616-3434
Federal Bar No. phv04243

DAVID E. NOVICK
ASSISTANT U.S. ATTORNEY
157 Church St., 25th Floor
New Haven, Connecticut 06510
Tel. (203) 821-3700
Federal Bar No. phv02874

CERTIFICATE OF SERVICE

This is to certify that on March 11, 2020, a copy of the foregoing Motion was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail on anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/

DAVID E. NOVICK
ASSISTANT UNITED STATES ATTORNEY