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VIA ECF FILING

Chambers of the Honorable Jed S. Rakoff
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street Room 1340
New York, NY 10007

RE: United States v. Robson, et al., No. 14-cr-00272

Dear Judge Rakoff:

On behalf of Paul Robson, I respectfully submit this letter in connection with sentencing.

Mr. Robson concurs with the facts submitted by the Department of Justice (the “government”), pursuant to Section 5K1.1 of the Sentencing Guidelines, as well as the facts submitted by the Probation Department in its Presentence Investigation Report to the Court.

As described in both submissions, Mr. Robson provided substantial assistance in connection with key prosecutions in this case, which came at a personal cost to him and his family. Mr. Robson expended significant time and resources in order to aid the government’s prosecution, and suffered backlash as a result of his cooperation, which caused him and his family emotional distress by threatening their privacy and safety in their own home¹; Mr. Robson’s greatest concern is keeping his family intact and ensuring that they are taken care of. In sum, throughout the government’s prosecution, Mr. Robson cooperated to the fullest of his ability, and from the beginning expressed deep remorse, accepting complete responsibility for his actions.²

For these reasons, Mr. Robson’s sentence should be significantly less severe than those given to Messrs. Allen and Conti. Mr. Robson’s conduct was less culpable and Mr. Robson has made efforts to right his wrong through his acceptance of responsibility and cooperation with the government. For example, Mr. Allen was Mr. Robson’s boss and oversaw the scheme, and he

¹ An anonymous and threatening letter received by the Robson family at their home in connection to Mr. Robson’s cooperation in this prosecution is annexed as Exhibit 10.

² Mr. Robson has been subject to release conditions since his plea on August 18, 2014, which is similar to having spent 26 months and 28 days on probation.

accepted no responsibility and was convicted at trial after attacking Mr. Robson as a liar. Mr. Allen was sentenced to 24 months and no fine or restitution. Mr. Conti likewise went to trial, and was sentenced to 12 months and 1 day and no fine or restitution. Mr. Conti was sentenced more leniently in recognition that, as Mr. Allen's underling, his conduct was less culpable.

In further support of the views expressed by the government, Mr. Robson's employer, family, and friends have written letters of support that provide insight into Mr. Robson, and echo the hardship suffered by the Robson family and Mr. Robson's deep remorse for his actions. These letters of support are annexed as exhibits.

In recognition of Mr. Robson's cooperation and level of culpability, I respectfully submit that a non-custodial sentence is appropriate. In particular, I respectfully submit that the Court impose a sentence of time served (i.e., the time spent at Court on the day of his surrender),³ or, in the alternative, I respectfully submit that the Court impose a sentence of time served followed by supervised release with conditions. I request that Mr. Robson be permitted to complete any imposed conditions at home in Chelmsford, United Kingdom.

Very truly yours,

BROWN RUDNICK LLP



Justin S. Weddle

³ See *United States v. Lahey*, 186 F.3d 272, 275 (2d Cir. 1999) (holding that the B-Felony rule does not preclude a sentence of no jail time).

CERTIFICATE OF SERVICE

I, Justin S. Weddle, hereby certify that on November 7, 2016, I caused a true and correct copy of the foregoing document to be served electronically on all registered users through the Court's CM/ECF system.

/s/ Justin S. Weddle
Justin S. Weddle