

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 17-20914-CR-ALTONAGA

UNITED STATES OF AMERICA

v.

LAWRENCE W. PARKER, JR.,

Defendant.

MOTION FOR DOWNWARD DEPARTURE PURSUANT TO U.S.S.G. § 5K1.1

Pursuant to Section 5K1.1 of the United States Sentencing Guidelines (“Guidelines”), the United States hereby moves for a downward departure from the advisory Guidelines range of defendant Lawrence W. Parker, Jr. to reflect his substantial assistance to the government. In support of this motion, the United States offers the following:

1. On December 28, 2017, the defendant pleaded guilty to a single-count information charging him with conspiracy to violate the Foreign Corrupt Practices Act (“FCPA”) and to commit wire fraud, in violation of Title 18, United States Code, Section 371. The defendant’s sentencing hearing is scheduled for April 11, 2018.

2. The defendant has cooperated with the government’s investigation since he was first approached by agents of the Federal Bureau of Investigation.

3. The defendant has provided substantial assistance to the government in the prosecution of other members of the conspiracy.

4. According to the Presentence Investigation Report prepared for the defendant, his Guidelines range of imprisonment is 57-71 months, with a statutory maximum term of 60 months of imprisonment.

5. Based on the defendant's substantial assistance, the United States believes that a downward departure is warranted. The United States recommends that the defendant's sentence of imprisonment be reduced by 33 percent from the low end of the Guidelines range.

WHEREFORE, the United States respectfully requests that the Court grant its motion to reduce the defendant's sentence by the percentage recommended in this motion.

Respectfully submitted,

SANDRA MOSER
ACTING CHIEF, FRAUD SECTION
Criminal Division
U.S. Department of Justice

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 12, 2018, I caused the foregoing document to be filed with the Clerk of the Court and to be delivered electronically to the following counsel:

Michael B. Cohen
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s/LOIS FOSTER-STEERS
Lois Foster-Steers
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