

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA,

CRIMINAL DIVISION

vs.

Criminal No. 1:20-cr-00031

GREGORY S. MANCINI,
Defendant.

Judge Susan Paradise Baxter

**DEFENDANT’S SENTENCING MEMORANDUM AND
MOTION FOR VARIANCE PURSUANT TO § 3553(A)**

AND NOW, comes the Defendant, Gregory Samuel Mancini, by and through his Attorneys, Douglas Sughrue and Robert Kinnear, filing this motion for a variance. In support thereof, Defendant avers the following:

1. Defendant was charged in a three-count indictment with violating the following:
 - a. Title 18 U.S.C. §§ 2423(b) and §§ 2423(e) Interstate Travel with Intent to Engage in Any Illicit Sexual Conduct, in and around November 2018;
 - b. Title 18 U.S.C. §§ 2252(a)(2) and §§ 2252(b)(1) Receipt of Material Depicting the Sexual Exploitation of a Minor, from in and around January 2015, to in and around January 2020; and
 - c. Title 18 U.S.C. §§ 2252(a)(4)(B) and §§ 2252(b)(2) Possession of Material Depicting the Sexual Exploitation of a Minor, from in and around January 2015, to in and around January 2020.
2. On August 18, 2020, the Defendant appeared for his arraignment and detention hearing.
3. On January 7, 2022, the Defendant appeared before United States District Judge Susan Paradise Baxter and pled guilty to all three counts of the Indictment.
4. There was no plea agreement in this case.
5. The presentence investigation report was filed on March 10, 2022, prepared by U.S. Probation Officer, Jancy Garman.
6. Sentencing is scheduled for June 9, 2022, at 2:00 PM.

7. Mr. Mancini hereby incorporates by reference the transcript of the detention hearing and associated exhibits.
8. In aid of sentencing, Defendant offers the following § 3553(a) discussion:

Introduction – The Court’s Broad Authority Over Sentencing

Gall v. United States, 552 U.S. 38 (2007), explained that a sentencing court “should begin all sentencing proceedings by correctly calculating the applicable Guidelines range”, but that the Guidelines are only the “starting point”. *Id.* The sentencing judge “must make an individualized assessment based on the facts presented” at sentencing. *Id.* at 50; *Rita v. United States*, 127 S.Ct. 2456, 2465 (finding the sentencing judge should consider reasons why a guideline sentence should not apply, “perhaps because the Guidelines sentence itself fails properly to reflect § 3553(a) considerations, or perhaps because the case warrants a different sentence regardless.”).

Title 18 U.S.C. § 3553(a), in pertinent part states:

- (a) *Factors To Be Considered in Imposing a Sentence.* –The court shall impose a sentence sufficient, but not greater than necessary, to comply with the purposes set forth in paragraph (2) of this subsection. The court, in determining the particular sentence to be imposed, shall consider—
 - (1) The nature and circumstances of the offense and the history and characteristics fo the defendant;
 - (2) The need for the sentence imposed—
 - (A) To reflect the seriousness of the offense, to promote respect for the law and to provide just punishment for the offense;
 - (B) To afford adequate deterrence to criminal conduct;
 - (C) To protect the public from further crimes of the defendant; and
 - (D) To provide the defendant with needed educational or vocational training, medical care, or other correctional treatment in the most effective manner;
 - (3) The kinds of sentences available;
 - (4) The kinds of sentence and the sentencing range established for—

- (A) The applicable category of offense committed by the applicable category of defendant as set forth in the guidelines—
 - (i) Issued by the Sentencing Commission pursuant to section 994 (a)(1) of title 28, United States Code, subject to any amendments made to such guidelines by act of Congress (regardless of whether such amendments have yet to be incorporated by the Sentencing Commission into amendments issued under section 994 (p) of title 28); and
 - (ii) That, except as provided in section 3742(g), are in effect on the date the defendant is sentenced; or

- (B) In the case of a violation of probation or supervised release, the applicable guidelines or policy statements issued by the Sentencing Commission pursuant to section 994 (a)(3) of title 28, United States Code, taking into account any amendments made to such guidelines or policy statements by an act of Congress (regardless of whether such amendments have yet to be incorporated by the Sentencing Commission into amendments issued under section 994 (p) of title 28);

(5) Any pertinent policy statement—

- (A) Issued by the Sentencing Commission pursuant to section 994 (a)(2) of title 28, United States Code, subject to any amendments made to such policy statement by act of Congress (regardless of whether such amendments have yet to be incorporated by the Sentencing Commission into amendments issued under section 994 (p) of title 28); and

- (B) That except as provided in section 3742 (g), is in effect on the date the defendant is sentenced.

- (6) The need to avoid unwarranted sentence disparities among defendants with similar records who have been found guilty of similar conduct; and

- (7) The need to provide restitution to any victims of the offense.

Application of § 3553(a) Factors

A. Nature/Circumstances of the Offense—History/Characteristics of the Defendant

Chapter 12—Findings, Conclusions, and Recommendations of the U.S.S.C. to Congress states the following at page 311;

Child pornography offenses are international crimes. Countless images depicting the sexual abuse of children are transmitted both domestically and internationally to offenders across the world, each of whom may redistribute the same image. Once an image is distributed via the Internet, it is impossible to eradicate all copies of it or to control access to it.² The harm to victims is thus lifelong.

² See Chapter 3 at 41, 64.

Mr. Mancini agrees that the charges for which he accepted responsibility are serious. Mr. Mancini acknowledges that his behavior which makes up Count 1 in the indictment reflects a specific harm to single, identifiable child. Mr. Mancini apologizes to the minor and the minor's family for the anxiety, panic, and harm caused by his actions. Mr. Mancini notes that the counseling in which he was able to participate prior to being incarcerated provided him insight on his behavior and how or why it changed from law abiding to unlawful—a change slow enough that he was unable to recognize the harm his actions were causing the minor. Mr. Mancini, his family, and support structure along with his supervised release officer will work together to provide the resources necessary to make sure Mr. Mancini never again falls into this harmful thought process.

With new tools to use to help deal with his thoughts and actions, Mr. Mancini submits that he is now able to recognize the bad thought patterns that trigger rationalizing normalcy into behavior that is abnormal and harmful.

Counts 2 and 3 within the indictment are more common charges in Counsel's experience. The nature and circumstances of the offense which support Mr. Mancini's pleas of guilt to those two counts are the same as anyone else's. However, Mr. Mancini submits that when compared to other people convicted of the charges in counts 2 & 3, Mr. Mancini has fewer photos (or

image files¹) and videos than the vast majority of federal child pornography cases. Moreover, many of the images on Mr. Mancini devices were found in unallocated space which means they had been deleted. The deletion of these images shows Mr. Mancini's intent to no longer access those them. The child pornography images on Mr. Mancini's devices were also not curated into organized file folders, playlists, etc. There is no doubt that the photos are illegal and even possession of one of them is a harm. But the facts and circumstances of these two counts of conviction are less voluminous and concerning when compared to the average offender.

Mr. Mancini had drastically fewer photos (or image files) and videos than the average person convicted of these same offenses. In 2019, non-production child pornography offenses had a median of 4,265 images, with some offenders having millions of images.

https://www.ussc.gov/sites/default/files/pdf/research-and-publications/research-publications/2021/20210629_Non-Production-CP.pdf at 4. The Commission has stated that the sentencing enhancements in §2G2.2 have not kept pace with technology, as technology permits the increase and ease of great quantities of images. Furthermore, “four of the six enhancements- accounting for a combined 13 offense levels- has become so ubiquitous that they now apply in the vast majority of cases sentenced under §2G2.2.”

https://www.ussc.gov/sites/default/files/pdf/research-and-publications/research-publications/2021/20210629_Non-Production-CP.pdf at 68. When compared to these offenders, Mr. Mancini's collection and deviancy is less serious. At the same time, Mr. Mancini understands that his travelling is a graver concern for society in general and this Court,

¹ Counsel does not know whether image and image file have the same meaning. Counsel assumes these words are used intentionally in the PSIR to differentiate between the image about which we all know and an image file which could be an unrecognizable thumbnail in some unreachable or accessible part of the computer's file structure.

specifically. Even though an increase in images possessed has grown due to technology, Mr. Mancini had significantly fewer image files than the median number of images possessed of 4,265. Mr. Mancini possessed a total of 477 image files and 9 video files. (PSI at 9). Of those image files, 152 or 32% were in unallocated space, meaning they had been deleted. The deletion of these image files shows Mr. Mancini no longer intended to access those image files. In essence, his deletion of those image files is illustrative of struggle through which he was going. Only forensic tools could find those image files. Of the video files, all of them were in the unallocated space. Mr. Mancini notes there were no videos on the laptop or desktop computers.

During Counsel's viewing of the evidence on February 8, 2021, Counsel was shown the evidence with Agent Wargo. At that time, Counsel was told that the computers had many fewer photos (now image files) in the allocated space than detailed in the PSIR. Counsel submits that is because the USA went to great lengths to detail the difference between "images of child erotica" and "image files of child sexual abuse material." When the PSIR refers to the broad term of "image files," the vast majority of the image files are most likely low quality thumbnail cache image files. They may not be actual .jpg photos which may first come to mind. There are actual photos/images and Mr. Mancini is not saying otherwise, but when totaling the number of images as described in the sentencing guidelines and comparing to other cases to reduce sentencing disparities, a photo or image is not equal to an image file. Image files in this case are of drastically low quality which is different than the run of the mill child pornography case. Moreover, image files are used by a computer to load more quickly in the future, if attempted. Basically, the computer maintains a thumbnail of the image in its file structure not normally accessed when using the laptop. Therefore, a deleted image or image file may leave remnants of the image in an almost inaccessible file folder in a low-quality, unusable format.

Computers often keep thumbnail cache if there had been a USB memory card used at one time. In this case, the PNY thumb drive was used by Mr. Mancini. Because of that fact, the computers upon which it was used would probably have “Image files” of those images on the thumb drive. The vast majority of the image files were thumbnail cache and not actual full size photographs of child pornography. Moreover, there are probably duplicate files overlapping between the thumb drive and the computer(s). Mr. Mancini understands that duplication does not necessary matter when applying the specific offense characteristics of §2G2.2, but they do matter when a Court has to consider the nature and circumstances of this individual case under §3553(a).

Mr. Mancini agrees that his charges are serious. Violation of them is a serious offense. Mr. Mancini has admitted to his crimes—taking full responsibility for them. The PSIR’s detailing of image files on the two computers and thumb drive uses a very broad term which perhaps should not be equated to actual photos. The child erotica mentioned is also not illegal to possess. Images of fully clothed, young children are also not illegal. As far as fashioning a sentence particular to Mr. Mancini, the Court should consider them, if at all, when setting conditions of supervised release.

Our Circuit has held a trial court may when policy disagreements are made with U.S.S.G. § 2G2.2 vary downward from the Guideline range. *United States v. Grober*, 624 F.3d 592 (3d Cir. 2010); *United States v. Booker*, 543 U.S. 220 (2005). In 2013, the Sentencing Commission released a *Report to the Congress: Federal Child Pornography Offenses*, largely because of an increased rate of below-guideline sentences for offenders under U.S.S.G. § 2G2.2. *See* U.S. Sent’g Comm’n, *Report to Congress: Federal Child Pornography Offenses* (2012) [Commission Child Porn Report]. The report acknowledged the below-guideline sentences by judges were

largely “a result of recent changes in the computer and Internet technologies that typical non-production offenders use, the existing sentencing scheme in non-production cases no longer adequately distinguishes among offenders based on their degrees of culpability.” *Id.* at ii, 323. Specifically, in 2008 a study was released that showed that the average sentence imposed on a convicted offender of child pornography offenses increased by 11.9% each year between 2002 and 2007. Troy Stabenow, Deconstructing the Myth of Careful Study: A Primer on the Flawed Progression of the Child Pornography Guidelines at 2 available at https://www.ussc.gov/sites/default/files/pdf/training/annual-national-training-seminar/2016/report_stabenow.pdf [Child Pornography Guidelines Article]. This means there is approximately a 300 percent increase in the average sentence for these offenders since 1994 to 2007. *Id.*

Further, in the Commission’s Report the Commission explained how enhancements for computer use and volume of the images “now apply to most offenders” and these guidelines “fail to differentiate among offenders in terms of their culpability.” Commission Child Porn Report at iii, xi, 209, 323. The Commission’s Report continues to go on to describe the changes in technology whereas the “technological changes have resulted in exponential increases in the volume and ready accessibility of child pornography, including many graphic sexual images involving very young victims, a genre of child pornography that previously was not widely circulated.” *Id.* at 6. Because “sentencing enhancements that originally were intended to provide additional proportional punishment for aggravating conduct now routinely apply to the vast majority of offenders,” *Id.* at xi, the “current guideline does not adequately distinguish among offenders regarding their culpability for their collecting behaviors”. *Id.* at 323. Thereby, the enhancements addressing volume and content of the images for the Guidelines, “in addition to [the] base offense levels of 18 or 22, result[] in guideline ranges that are overly severe for

some offenders in view of the nature of their collecting behavior.” *Id.* The Commission’s Report continues to explain the different types of material now widely available and the series of organization of that material. *Id.* at 61-92.

Ultimately, the Commission’s Report concluded, “[t]he current sentencing scheme in §2G2.2 places a disproportionate emphasis on outdated measures of culpability regarding offenders’ collecting behavior and insufficient emphasis on offenders’ community involvement and sexual dangerousness.” *Id.* at xx, 321. The Commission turned then to a request to Congress to update these guidelines “to account more meaningfully for the current spectrum of offense behavior regarding the nature of images, the volume of images, and other aspects of an offender’s collecting behavior reflecting his culpability (e.g., the extent to which an offender catalogued his child pornography collection by topics such as age, gender, or type of sexual activity depicted; the duration of an offender’s collecting behavior; the number of unique, as opposed to duplicate, images possessed by an offender),” and the use of modern computer and Internet technologies.” *Id.* at xviii-xix, 322-23.

The USA concentrates on the possession of child pornography and concluded that just because a crime happens more often does not mean the crime should receive less punishment. The attempt to equate a dramatic increase in bank robberies resulting in less punishment for the bank robbers to the ease and speed with which a non-production possession of child pornography can be accomplished is wrong. No one has ever said the BOL of possession should be lowered. The Report merely says the BOL enhancements that currently exist were created in an environment that no longer exists. In applying the §3553(a) factors, the Courts have been varying by giving different weights to each enhancement resulting in a high number of variances for actors in non-production of child pornography cases. Those variances do not reflect a soft on

crime approach of the judiciary as much as it reflects the inaction of Congress to follow through on the reports and recommendations of the commission it created.

Due to the inaction of Congress, the Courts are left to deal with sentencing disparities for non-production possession of child pornography cases. An area of criminal law where the statistics are clear, cases like Mr. Mancini's exist. There is no prior record. There was an unrecognized mental/emotional issue for which counseling was sought and obtained. There was a crime, guilt admitted, and responsibility taken. The risk of recidivism is very low. The risk of sexual recidivism is significantly lower.

The USA also mentions that Mr. Mancini travelled and that differentiates himself from the other people who merely possessed child pornography. Mr. Mancini agrees. His travel to Georgia was a mistake for which Mr. Mancini has true regret. Mr. Mancini acknowledges traveling is a serious societal concern. Although the USA says travelling is the more serious crime, the sentencing guidelines do not reflect that idea. The final adjusted BOL for travelling, without adjusting for multiple charges and units, is 26. A BOL of 26 minus 3 for acceptance of responsibility would place Mr. Mancini's guideline range at 46-57 months—which is a serious sentence of incarceration for anyone, but especially for someone with no prior contact with law enforcement. Furthermore, there is no mandatory minimum with respect to the traveling offense which seems to indicate that Congress wants judges to be free to take the individual offender into account when fashioning a sentence as per §3553(a) and the long history of the American criminal justice system.

Count 2 has a mandatory minimum of 5 years in jail and is combined with Count 3 for guideline calculation purposes. The application of almost every enhancement listed in the guidelines results in an adjusted BOL of 37 which is higher than those dangerous drug dealing

career offenders selling fentanyl on our streets and killing people. With an adjusted BOL of 37 minus 3 for acceptance of responsibility, Mr. Mancini is left with a guideline range sentence of 151-188 months in jail. The USA states “No one can credibility claim that the sentencing guidelines are too severe for an adult who flies hours across the country to abuse a vulnerable boy.” For the harm raised by the USA—the traveling—the guidelines call for a 46-57 month sentence. Does the fact that a person who does this also possessed child pornography surprise anyone? No, it should not. Does anyone think the punishment for possession of relatively few child pornography image files should be 3 times higher than someone who travels? No, they should not. Sentence Mr. Mancini for traveling. The mandatory minimum sentence of 60 months is 14 months longer than that which is required by the guidelines for traveling.

Prior to this report, the *Grober* court found first that “enhancements are essentially inherent in the crime, and thus apply in nearly every case.” *U.S. v. Grober*, 624 F.3d 592, 597 (3d Cir. 2010). Second, the court found “enhancements promote sentencing disparities.” *Id.* Third, “the Court described how, given the nature of child pornography, it can be very difficult for the defense to rebut the government’s characterization of the egregiousness of the defendant’s conduct or dispute the government’s evaluation of the defendant’s collection compared to the collections of others, both of which may bear on the applicability of § 2G2.2’s enhancements.” *Id.* at 597-598. Ultimately, the *Grober* court sentenced the Defendant to the statutory minimum five years imprisonment, after an evaluation of the recommended guideline recommendation of 235-293 months. *Id.*

However, a much more recent example is in the *Ramey* court holding. Whereas, there was a 98% variance from the Guideline range and the appeal court held this type of variance “necessitates a careful and significant justification.” In addition, on substantive review vacate

sentence if “no reasonable sentencing court would have imposed the same sentence on that particular defendant for the reasons the district court provided.” *Tomko*, 562 F.3d at 568.

Although, this sentence was ultimately vacated and remanded, it imposed a great emphasis on the standards to facilitate a sentence of this magnitude of a variance being allowable under the proper circumstances. *United States v. Ramey*, 721 Fed.Appx. 135 (3d Cir. 2018).

History/Characteristics of the Defendant

Throughout the USA’s sentencing memorandum, the USA invokes the use of a myriad of adjectives to try to paint Mr. Mancini’s behavior as “unquenchable” or having “twisted desires” or of living a “double life.” The USA alludes to Mr. Mancini’s teaching degree as being a small part in his larger quest to be placed close to young persons to victimize them without any supporting evidence. Another detail the USA likes to mention and place in a bad light is the journal found on Mr. Mancini’s computer. A journal about which the USA knows nothing, but states in the fourth sentence of its sentencing memo that the journal on his thumb drive “unequivocally expressed a sexual interest in younger boys.” If the USA was educated about the treatment program used for the sexual offenders it prosecutes and puts in jail, the USA’s opinion may change. With that knowledge, the USA may have said that along with extensive pre-indictment treatment for his illness and emotional issues, Mr. Mancini was actively participating in his treatment by journaling as requested by his therapist. Journaling is a useful part of therapy so that issues and thoughts can be discussed during individual and group therapy sessions. Since all convicted child pornographers have to undergo sexual offender therapy, you would think the USA would want the actors to actively participate in their counseling.

As argued by the defense throughout this case, Mr. Mancini was taking all of the actions society wants a person to do when they accept what they did was wrong and know that their

actions were harmful. Offenders need to learn about why they did what they did so that the foundational problem that led to aberrational behavior can be avoided in the future. Mr. Mancini was not a danger requiring pretrial detention at the time of his arrest in this matter. But he was detained. Upon his release from the BOP, Mr. Mancini will not be a danger to the public. He will finally be back in contact with effective counseling and treatment for his emotional issues. Of course, Mr. Mancini wishes to attend effective sexual offender treatment while finishing his BOP sentence. Mr. Mancini submits that FCI-Elkton seems to have an effective sexual offender treatment program and is relatively close to his support structure so in-person visits can continue.

The USA has argued consistently that Mr. Mancini is a danger that should never be allowed around kids again. One would think the speed with which the USA acts is directly proportional to the harm it seeks to stop. However, in Mr. Mancini's case, the USA waited 20 months after his arrest in Georgia to arrest Mr. Mancini. When the USA showed up at Mr. Mancini's residence with a search warrant signed by a judge, did they have an arrest warrant for Mr. Mancini after the filing of a criminal complaint? No. The USA waited until July of 2020 to arrest Mr. Mancini². As much as the USA argues that Mr. Mancini is a huge risk to society and should never see the light of day again, their actions speak otherwise.

The delayed action by the USA is understandable. Mr. Mancini had a case pending in Georgia that could resolve every governmental interest. A court reviewed his risk of flight and danger to the community, and it gave him bond. He had strong ties to the Erie, PA community. Mr. Mancini was participating in sexual offender treatment. He was no longer working in schools. Local media wrote in detail and at length about Mr. Mancini's arrest. The public was

² Some delay was obviously caused by covid 19 lockdowns and inability to convene a grand jury for short time.

aware of the charges. Simply put, Mr. Mancini was doing all of those things we want people arrested for serious crimes to do as society. Society was safe from Mr. Mancini. Society is safe from Mr. Mancini and any sentence of incarceration above the mandatory minimum of 60 months incarceration is greater than necessary to achieve the goals of sentencing.

Prior to his arrest in Georgia, Mr. Mancini lacked any criminal history. Following his arrest in Georgia, he took affirmative steps to address his underlying sexual deviancy and emotional issues by seeking counseling at two different facilities—the first one was near Buffalo, New York and the second one was a local facility known as Parkside. (Transcript of Proceedings, August 18, 2020, testimony of Chris Laythe, LCSW (hereinafter N.T.) at 15). Mr. Mancini's counseling began in May of 2019 shortly after his arrest and continued until his incarceration on the case at bar. Therapy consisted of individual counseling until January of 2020, at which time he proceeded onto offender group therapy. (N.T. 17). During his time in therapy, he was subject to a Community Abuse Response Team (CART) contract, which provided safety to the community. (N.T. 18). The contract required no contact with the victim, no unsupervised contact with minors, to abstain from drugs and alcohol, and participate in therapy/complete journals and logs. (N.T. 18). Mr. Mancini complied with the contract.

Following the execution of the search warrant and seizure of his electronic devices, Mr. Mancini felt free to fully disclose his child pornography issue with his treatment provider. (N.T. 17). Notably, prior to the disclosure of the child pornography, Mr. Mancini discussed his significant pornography use over the years with LCSW Laythe. (N.T. 20). Mr. Mancini was progressing successfully in therapy according to LCSW Laythe. She further opined that he would not have an issue complying with any pretrial release conditions which were set by the

Court. (N.T. 23). Therefore, there is no reason to believe that Mr. Mancini will not be able to comply with the conditions of supervised release.

Mr. Mancini has no criminal record. He is smart. He is confronting his challenges. He has a vast support network upon which to rely. That support network is aware of Mr. Mancini's actions, and they are learning about the issues which cause a person to travel to be active with a young person or begin to view and download child pornography. The Mancini family is not hiding from Greg's problems. Their entire network of family & friends is aware of these charges and Greg's guilty plea. As a result, Greg has not become the black sheep of the family or the black mark on the family's crest. An outpouring of support from members of the Mancini family and their friends is displayed in the 20 letters of support included in Exhibit A.

What do all of these letters say about Greg Mancini and the Mancini family? The letters show the actions of this family and the plan they have to make sure Greg is in a good, supportive, healthy environment when he gets out of jail. This community is made up of scientists, licensed clinical social workers, teachers, coaches, cousins, Godparents, and life-long family friends that will help ensure a successful outcome for Greg. Greg has already shown that he is serious about his treatment. Those that support him know treatment and counseling is what is needed. They recognize the harm and reflect confusion as to why Greg did what he did while at the same time acknowledging that Greg and society benefit from treatment and management instead long, cold incarceration.

In Greg's own letter to the Court and the Public at large, he writes:

The actions that bring me before the court today are inexcusable. While the intensive therapy I received before my arrest has helped me to come to terms with my past, now certain factors that shaped me while I was still only a young child, ultimately I take full responsibility for my actions and must atone for them. I've caused pain. I've helped ~~contribute~~ give an audience to individuals who create and distribute these materials, all the while causing profound damage to countless people. If I could, I'd take it all back, a sentiment I mean from the very bottom of my heart. For the rest of my life I will be working toward mending the wounds I've inflicted on family, friends, and the community as a whole.

He goes on to state:

I write to you today a remorseful, repentant man seeking forgiveness and closure to this embarrassing chapter of my life. During my time incarcerated at Erie County Prison I've had thoughts only for the people I've hurt and the necessary steps I must take to once more enter into and be a productive member of society.

The letters in support describe a lifetime of helping others. Whether standing up for a friend being bullied in school to buying a struggling basketball player sports glasses to wear so he could see better and play better to helping those with whom he is currently incarcerated communicate with their lawyers and the Courts, Greg is continuing to help others.

Greg and his family did not shy away from these charges or try to keep them secret or to try to limit the information from those around them. Greg is an understanding individual, who would help others around him. He was gainfully employed, even while on bail from the Georgia offense, and sought treatment for sexual deviance. He was being successful in his treatment. He has shown through his actions while out on bail that he is amendable to treatment.

These actions—not words—show this Court that a guideline range sentence mentioned by the USA and detailed in the PSIR is greater than necessary to achieve the goals of sentencing.

In Federal Sentencing of Child Pornography Non-Production Offenses from the USSC, it is noted that in the majority of non-production child pornography offenders received a variance

below the guideline range. https://www.ussc.gov/sites/default/files/pdf/research-and-publications/research-publications/2021/20210629_Non-Production-CP.pdf, USSC June 2021, (herein after “Non-production”) at 5. Non-government sponsored range variances occurred in 42.2 percent of the sentences imposed. *Id.* Of 119 possession offenders in 2019 with a guideline range of 78-97 months, the average sentence was 47 months with 81.5% sentenced below the guideline ranges. *Id.* At 54-55. The sexual recidivism rate for all non-production offenders was 4.3 percent. *Id.* These facts are mentioned because they matter. Many of the problems with the guidelines for non-production possession of child pornography are a result of inaction of Congress. The Courts are left to fend for themselves in properly applying the guidelines to these offenses and the importance to attach to the BOL enhancements which used to only apply in some cases when most child pornography was collected in paper format and obtained through the mails. Videos were hard to come by and were in VHS format. Today, a 3 second video clip is a video equal to that of a 30 minute long video on VHS tape which was solicited through an odd add from the back page of a porno mag and delivered via the mail. They should not be equal.

Mr. Mancini submits that the nature and circumstances of the crimes to which he has pled guilty and is awaiting sentencing and his history and characteristics should result in a sentence of 60 months with the BOP, a period of supervised release, registration as per local law, sexual offenders’ treatment, continued employment or vocational retraining, and consistent reporting to his supervised release officer. Mr. Mancini requests he be placed at a facility that offers sexual offender treatment in a safe environment as close to Erie, PA as possible—FCI Elkton. The evidence is clear that successful reentry into society is heavily dependent on continued contact with the persons’ support network. Mr. Mancini submits that this sentence is severe and lengthy and is sufficient, but not greater than necessary to achieve the goals of sentencing set out in

§3553(a). Supervised release is a serious part of a sentence. A period of supervised release allows the close supervision of Mr. Mancini as he begins the next chapter in his life—a chapter that is certainly going to be filled with its own challenges. Supervised release is a real restriction on his liberty interests and is effective at reducing recidivism.

To increase his likelihood of success, Mr. Mancini also requests that this Court recommend that the BOP consider Mr. Mancini for release to a halfway house as early as 12 months from his max out date to permit him time to obtain employment, find healthcare, a treatment provider, and reenter society as a sex offender.

B. The Need for the Sentence Imposed to Reflect the Seriousness of the Offense, to Promote Respect for the Law, and to Provide just Punishment for the Offense

So far, the criminal justice system in which Mr. Mancini has been involved and the pretrial service officers handling Mr. Mancini's pretrial supervision in Georgia have created and left a permanent impression upon him that this matter is of the greatest importance. Mr. Mancini understands the gravity of the life-altering situation to which his actions have exposed him, and the harm caused to the minor in Georgia. He realizes that the college degree he worked so hard for and the future he had been building for himself are significantly altered. While recognizing the serious of the offense, Mr. Mancini has not let that defeat him. Although knowing the deck is stacked against him, Mr. Mancini continued to take whatever programs were available to him in the Erie County Jail and completed an Anger Management program. During covid-19 lockdowns, the Erie County Jail drastically limited the programming available to its inmates. While reflecting on the harm he caused, Mr. Mancini tries to stay focused on his future—he continues to work towards healthy relationships and a productive future.

A common theme in all of the letters of support to this Court is that Mr. Mancini has been raised to be kind and respectful. The sheer number of people writing on behalf of Mr. Mancini

who describe Greg as being a very respectful and kind child as they observed him grow should provide this Court with great confidence that Mr. Mancini will respect any and all conditions of supervised release and will work diligently to stay healthy and become a success story this Court can share with others. Mr. Mancini has great respect for the law and the rules of the Erie County Jail. Mr. Mancini does not need further incarceration to promote respect for the law.

Mr. Mancini acknowledges that his offenses are serious and deserving of just punishment, which can be accomplished with the 5 year mandatory minimum sentence and a term of supervised release. Mr. Mancini needs to serve his time, take part in necessary treatment, and re-enter society as a healthier, productive, law-abiding citizen. A carefully crafted sentence allows all of us to be safer as the goals of sentencing are reached. This possibility and respect for the law is best served if this Honorable Court imposes a sentence which is sufficient but no greater than necessary to achieve the goals of §3553(a). Otherwise, the punishment becomes far more punitive than rehabilitative.

In the present case, the defendant has shown that he can be gainfully employed, admitted to his deviance to the public and treatment providers, and he sought treatment when not incarcerated. Given the average sentence of 47 months for non-production child pornography, the immediate actions of Mr. Mancini, and a lower guideline range sentence for the travelling offense found in Count 1, a sentence of 60 months with the BOP, a period of supervised release, registration as per local law, sexual offenders' treatment, continued employment or vocational retraining, and consistent reporting to his supervised release officer is a sentence that is sufficient, but not greater than necessary to achieve the goals of sentencing.

Mr. Mancini requests he be placed at a facility that offers sexual offender treatment in a safe environment as close to Erie, PA as possible—FCI Elkton. The evidence is clear that

successful reentry into society is heavily dependent on continued contact with the persons' support network. Supervised release is a serious part of a sentence. A period of supervised release allows the close supervision of Mr. Mancini as he begins the next chapter in his life—a chapter that is certainly going to be filled with its own challenges. Supervised release is a real restriction on his liberty interests and is effective at reducing recidivism.

To increase his likelihood of success, Mr. Mancini also requests that this Court recommend that the BOP consider Mr. Mancini for release to a halfway house as early as 12 months from his max out date to permit him time to obtain employment, find healthcare, a treatment provider, and reenter society as a sex offender.

C. The Need for the Sentence Imposed to Afford Adequate Deterrence to Criminal Conduct

Counsel for Defendant submits that third-party deterrence is a sentencing variable that is extremely difficult to quantify or measure. Lengthy sentences do not deter anyone. There are no studies that show long sentences reduce crime. Third-party deterrence from a news release in most cases, even the most serious and high profile, have little effect on the actions of others. The ability for human beings to rationalize their behavior and convince themselves that they will not be caught if they do unlawful acts is what separates humans from every other animal on the planet when assessing risk to life and liberty. If long prison sentences deterred others from committing crime, the drug war would have been won long ago.

People who know Mr. Mancini are aware of the extent of the harm he has caused himself and his family. They are aware of the harm caused to the minor in Georgia. Mr. Mancini offers his sincere and complete apology to the minor and the minor's family in Georgia. Mr. Mancini, for his own part, looks forward to proving to this Court and the Government that he can make

better, healthier, smarter decisions for himself and his family. His letter to the Court found in Exhibit A firmly states as much.

D. The Need for the Sentence Imposed to protect the Public from Further Crimes of the Defendant

As previously noted, the sexual recidivism rate for all non-production offenders was 4.3 percent. (Non-production at 65). While on bond for the Georgia offense, Mr. Mancini took it upon himself to seek sexual offender treatment. He was gainfully employed by Heatron. Heatron was willing to keep him as an employee even after these charges were filed—a rarity indeed. Furthermore, Heatron has said that they would be happy to rehire him upon his release from incarceration.

Greg has had no misconducts during his incarceration. As such a term of imprisonment of 5 years with supervised release, sexual offender and mental health treatment and counseling, and special conditions would be sufficient to protect the public from further crimes from the Mr. Mancini. Mr. Mancini requests the additional recommendations as more fully sated above.

E. The Need for the Sentence Imposed to Provide the Defendant with Needed Educational or Vocational Training, Medical Care, or Other Correctional Treatment in the Most Effective Manner

Prior to these incidents, Mr. Mancini spent many years as a working, productive member of society. He received a master's degree in education and instruction in 2014. He was involved in teaching/education at The Barber National Institute from 2015 until 2018. The Barber National Institute is an organization providing services for people with autism spectrum disorders and those needing a high level of emotional support. He was also a substitute teacher in approximately 6 area school districts and 5 Diocese schools from 2012 to 2015. Mr. Mancini was a substitute through Kelly Staffing Services. While substituting, Mr. Mancini taught all subjects from gym to psychology to special education—life skills. These accomplishments were

not done to bring himself into close contact with minors. For all of his life Mr. Mancini helped those around him and gave selflessly to those in need. Teaching was a natural extension of those actions. The letters of support within Exhibit A corroborate this fact. After his arrest in Georgia, Mr. Mancini was no longer employable as a teacher. Mr. Mancini sought employment elsewhere in a totally new industry with Heatron in Erie, Pennsylvania from May 2019 to his arrest in July 2020. After his arrest in this matter, Heatron maintained support of Mr. Mancini and offered to continue to employ him.

Mr. Mancini entered sexual offender treatment on his own volition from January of 2019 until his incarceration for this matter. Upon his release, Mr. Mancini intends to work closely with his supervised release officer to obtain the best educational, employment, and treatment opportunities available. A sentence which includes additional incarceration beyond the time mandated is not needed to provide Mr. Mancini with educational or vocational opportunities. By working diligently with his supervised release officer, Mr. Mancini will be able to achieve any goal that this Court establishes. Mr. Mancini also intends to continue participating in counseling programs during and after his confinement.

Mr. Mancini requests the sentence and recommendations as more fully detailed above.

F. The Kinds of Sentences Available and the Sentencing Range Established

Mr. Mancini understands that a significant period of incarceration is certain and that he is subject to a statutory mandatory minimum sentence of five (5) years with a term of supervised release to follow. Furthermore, pursuant to Chapter 5 of the Guidelines, the guideline range of imprisonment based upon a total offense level of thirty-four (34) and a criminal history category of I is 151 to 188. Defendant submits that any sentence in or near this range would be excessive and greater than necessary to comply with the purposes of sentencing. Any sentence of

imprisonment should be adjusted to reflect the arguments above to avoid any sentencing disparities while accounting for the balancing of the §3553(a) factors.

Mr. Mancini submits that a day in jail today and the days Mr. Mancini spent in throughout the pandemic is much different than a day in jail was in 2019. Today, a day in jail is not only filled with the normal stressors of losing liberty but also the added panic and anxiety of being held in a closed environment where social distancing is impossible, cleaning supplies are limited, and the use of communal lunchrooms, showers, sinks, and bathrooms are the standard. Jail was a place where the infection rate of COVID-19 was higher than the general public. The COVID-19 infection rate of any closed facility community that has conducted mass testing has been as high as 60%. Since vaccines have been widely available, the risk of serious illness subsided—even to those in jail. However, the stress and anxiety experienced by those incarcerated people was and is real and powerful. Incarcerated people worried about themselves but they also were consumed with guilt since they were not in a position to help their loved ones on the outside. A son who would easily help care for his parents and help keep them safe during the pandemic was not able to help due to his actions. Incarcerated people could only listen to a cough or hoarse voice through a hollow telephone line while trusting that their loved ones would be safe—that they would survive.

In March of 2020, jails stopped permitting familial visits. When Mr. Mancini was arrested in this matter and incarcerated in the Erie County Jail, he was immediately isolated from his family support system. He was also isolated from the treatment he was successfully completing. Hollow telephone calls, emails, and blurry, unreliable video visits replaced face to face meetings filled with smiles and supportive looks and body language. A day in jail today is equivalent to at least 10 days in 2019 if not more.

A review of the final PSIR reveals the dichotomy of our current sentencing system. Meaning, different sentences are available depending on whether a person looks for guidance from the statutes or the guidelines. Of course, U.S. Supreme Court cases like Booker, Kimbrough, Rita, and Gall each provides the District Court Judge the authority to create a sentence which considers the individual factors of each case and each defendant to fashion an appropriate sentence—a sentence which is sufficient, but not greater than necessary, to achieve the goals of §3553(a).

Accordingly, it is submitted based upon the particular facts of this case, a sentence below the guideline range is a reasonable and sufficient sentence that will punish Mr. Mancini and enable Mr. Mancini to become a healthy, lawful, and productive member of society. As such, we request a sentence consistent with the mandatory minimum sentence of 5 years with the BOP and a period of supervised release as more fully stated above.

G. The Need to Avoid Unwarranted Sentence Disparities Among Defendants with Similar Records who have been Found Guilty of Similar Conduct

The U.S.S.C. promulgated the sentencing guidelines while continually updating them based upon the empirical data garnered from sentences entered by U.S. District Court Judges nationwide. As a general principle, the sentencing guidelines do a good job ensuring that equally-situated Defendants are treated/sentenced similarly.

Sentencing disparities across the nation is the main concern of the Report to Congress by the U.S.S.C concerning child pornography cases. The Commission is seeing the data on cases like Mr. Mancini's and has notified Congress that the guidelines no longer have the impact intended because the harms for which the BOL enhancements were intended no longer exist. Better put, the reason a computer received an enhancement is because the uninformed believed it would provide a dark and secret place to store and view child pornography. Today, the use of a

computer leads law enforcement to the door of every offender as can be seen in any search warrant requesting to search the home of an alleged child pornographer. Additionally, the number of images used to be an effective way to treat people differently when the number of images depended upon the gathering of polaroid photos via the mails when corresponding to some P.O. Box from the back of a 1980s porn mag and the storage of those polaroid photos or other fragile film had to be in a safe environment. Basically, it was hard to collect 600 images pre-1992 and remained difficult up until approximately 2007 when high speed broadband access became the standard instead of 14.4 kbs or 28.8 kbs external modems. Collecting videos was even more rare. Today, thousands of images can be collected, and video clips of all lengths can be collected in the time it takes to snap of a finger.

Mr. Mancini submits that to avoid sentencing disparities, a sentence of sixty (60) months of incarceration plus a period of supervised release is a sentence that is sufficient, but not greater than necessary to achieve a sentence pursuant to Title 18 U.S.C. § 3553(a) as more fully stated above.

H. The Need to Provide Restitution to any Victims of the Offense

Mr. Mancini is aware that restitution is possible but is currently unaware of any claim for restitution at this time.

WHEREFORE, for the foregoing reason and in the interests of substantial justice, Greg Mancini respectfully requests that this Honorable Court sentence him to 60 months with the BOP, a period of supervised release, registration as per local law, sexual offenders' treatment, continued employment or vocational retraining, and consistent reporting to his supervised release officer.

Mr. Mancini requests he be placed at a facility that offers sexual offender treatment in a safe environment as close to Erie, PA as possible—FCI Elkton.

To increase his likelihood of success, Mr. Mancini also requests that this Court recommend that the BOP consider Mr. Mancini for release to a halfway house as early as 12 months from his max out date to permit him time to obtain employment, find healthcare, a sexual offender treatment provider, and reenter society as a sex offender who are known to have legitimate difficulty getting out from under the stigma attached to such a political label.

Respectfully submitted,

/s/ Douglas Sughrue
Douglas Sughrue, Esq.

/s/ Robert Kinnear
Robert Kinnear, Esq,

I write to you today a remorseful, repentant man seeking forgiveness and closure to this embarrassing chapter of my life. During my time incarcerated at Erie County Prison I've had thoughts only for the people I've hurt and the necessary steps I must take to once more enter into and be a productive member of society.

The actions that bring me before the court today are inexcusable. While the intensive therapy I received before my arrest has helped me to come to terms with my past, how certain factors that shaped me while I was still only a young child, ultimately I take full responsibility for my actions and must atone for them. I've caused pain. I've helped ~~assist~~ give an audience to individuals who create and distribute these materials, all the while causing profound damage to countless people. If I could, I'd take it all back, a sentiment I mean from the very bottom of my heart. For the rest of my life I will be working toward mending the wounds I've inflicted on family, friends, and the community as a whole.

I wish to apologize to all parties involved with my case. To the court I am sorry for taking up your ~~valuable~~ valuable time. To US Attorney Trabold for forcing you to prosecute my case. To each and every victim of abuse whose wounds I once more tore open by my actions. And, lastly, to my family, who have stood by me all my life, particularly my parents who are good, honest people who deserve a better son than the one I've become. To all of you, I am so sorry.

I understand with all actions come consequences and I must be sentenced today for the crimes I've committed. I am ready to submit to your ruling humbly and respectfully. I only ask that you consider before making your judgement a few items. The intensive therapy I received both individually and in a group setting helped me make profound breakthroughs into who I am as an individual and what I must do to live a productive, honest life. Once the FBI raided my house I partook in six months of group therapy a Sex Offender Treatment Program meant for individuals post-conviction and, typically after state and federal sentences have been served. And, lastly, that in the time spent at Erie County Prison I have been a model prisoner, free of any form of disciplinary action. I ask only that while you must sentence me to time away from my family that you'll consider leniency in your judgement.

For a long time I've been a man scared of who he was and what needed to be done to become an acceptable member of society. That era is over and I am fully committed to becoming the person I'm supposed to be. Whether in federal prison, on probation, or free in the community I will actively seek further therapy that helps me to address ongoing issues. I will live every day to the fullest, committed to being a person my family can be proud of. I cannot take back what I did though I pray every day I could, I

Can only take responsibility. Offer my deepest apologies and express my hope to be afforded the
chance to heal some of the wounds I've inflicted.

Thank you,

Respectfully

Gregory Samuel Mancini

GREGORY SAMUEL MANCINI

4712 North Wayside Drive
Erie, Pennsylvania 16505
January 12, 2022

The Honorable Susan Paradise-Baxter
Magistrate Judge
U.S. District Court, Western District of Pennsylvania
Erie Federal Court House
17 South Park Row
Erie, Pennsylvania 16501

Dear Judge Paradise-Baxter:

In my profession as a secretary, I have drafted many letters but this has to be the most difficult because it involves someone near and dear to my heart, my son, Gregory (Greg) Mancini. I hope that through my letter you can catch a glimpse of the caring individual that he truly is and that a request for sentence leniency will be possible.

As you are aware, Greg has been incarcerated in the Erie County Prison since July, 2020. During these 20 months he has not lost his spirit and continues to make the most of his situation keeping a positive attitude even though COVID has reduced "out time" to as little as one hour per day. He has told us that he fills his days reading, writing, exercising in his cell and even helping other inmates with letters to their attorneys. I have no doubt that he displays the utmost respect for the officers and other inmates as he was raised to be that type of a person.

Since Greg was a little boy he has always been loved by everyone because of his unselfish nature and willingness to help out where he could. One such example would be while coaching a grade school basketball team. He noticed that a younger player was having some trouble dribbling the basketball and could not look up to see the court. Using his own money he purchased a special pair of sports goggles to correct this shortcoming and help the player. Also, while working at the Barber Center he was a highly regarded professional who encountered difficult situations every day with the 'life-skills' clients which required patience and understanding. You could always count on Greg to find the best in a person, regardless of the handicap. That ability continues to be displayed throughout the many pods he has resided in at Erie County Prison, and the number of individuals he has met with various personalities and problems.

Prior to his incarceration, Greg voluntarily attended two therapy sessions; one that was a group session where prior convicts took part as well as one-on-one sessions. Greg was always upbeat after these sessions and it is unfortunate that he has been unable to receive any therapy since July, 2020. Since I am not in Greg's situation I can only imagine that stopping therapy "cold turkey" would leave a person floundering when it helped him so much with his situation.

Judge, please consider more therapy time rather than "jail time" for Greg. He is aware that he needs help with his addiction and can only benefit from continued therapy and a chance to restart his life.

Thank you for taking the time to read my thoughts.

Sincerely,

A handwritten signature in cursive script that reads "Cindy Mancini".

Cindy Mancini

Mother of Gregory S. Mancini

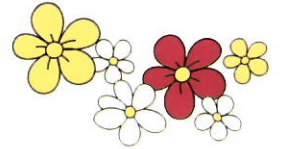
HI DOUG ..

4712 North Wayside Drive
Erie, Pennsylvania 16505
January 20, 2022

The Honorable Susan Paradise-Baxter
Magistrate Judge
U.S. District Court, Western District of Pennsylvania
Erie Federal Court House
17 South Park Row
Erie, Pennsylvania 16501

Attached is my
letter to the judge in
support of Greg. Please
let me know if you need
anything else.

Sam



Dear Judge Paradise-Baxter:

I am writing to you asking for sentence leniency for my son Gregory Samuel Mancini who has been incarcerated at Erie County Prison since July 20, 2020.

I am Mr. Mancini's father and my wife and I have raised Gregory and his two brothers to be kind, caring young men and we believe we did so to the best of our abilities. His past actions are contrary to the way he was raised and the person he truly is.

I am humbly asking you to be lenient with his sentencing for several reasons. Let me begin by saying that Gregory is not the person that the prosecution portrays him to be. He is a compassionate individual who has touched many lives in a very positive way. He's a person of good moral character, and has shown this many times with his actions prior to, and during his incarceration. There are numerous examples that I can provide. While at Erie County Prison, Greg has provided support and assistance to many of his fellow inmates. He has helped them with writing letters to family members, with writing appeal letters, and help with the various legal questions they may have.

Most recently he ordered a commissary pack with his own funds for a fellow cellmate who has nothing. He genuinely cares about those around him, and especially those less fortunate than he is.

He realized that he had a problem, and voluntarily sought professional help after his arrest. He travelled weekly to Buffalo, New York for therapy for many months before switching and getting help locally with Parkside Psychological Associates here in Erie. His goal throughout has been to better understand and overcome his condition. Not just to deal with it, but to break away completely from this addiction. He has continuously expressed his sorrow for his past actions, and his desire to get better.

It is my sincere belief that what my son needs is continued professional counselling, and not an extended prison sentence. Gregory's mistakes are tragic, but he is still a caring human being. I believe strongly he is someone who can and will be

rehabilitated if given the future opportunity to do so. And, he has a loving and caring family that will assist him in achieving this.

Thank you so much for taking the time to read my letter. Although my wife and I will never understand some of Greg's past actions, we still believe that our son is truly a good person with a good heart, and has a bright future awaiting him. Sometimes, all that is needed is a second chance.

If you would like to contact me about my son Gregory I can be reached at (814) 838-3078, or by e-mail at samuel.mancini@verizon.net.

Sincerely,

A handwritten signature in blue ink that reads "Sam Mancini". The signature is written in a cursive style with a large, sweeping initial "S".

Sam Mancini
Father of Gregory Mancini

Christopher Mancini

1004 Schauer Drive

Galloway, OH 43119

February 13, 2022

The Honorable Susan Paradise-Baxter

Magistrate Judge

U.S. District Court, Western District of Pennsylvania

Erie Federal Court House

17 South Park Row

Erie, Pennsylvania 16501

Dear Judge Paradise-Baxter,

My name is Christopher Mancini. I am the brother of the defendant, Gregory Mancini, and I am writing this letter as a defense of my brother's character and in the hopes that you will be lenient when sentencing him for the crimes that he finds himself currently imprisoned for.

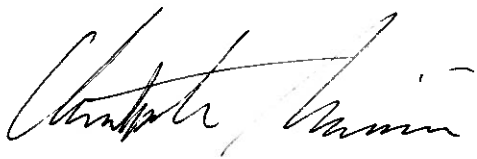
I have no dispute regarding the specifics of my brother's case. In all honesty, I have been quite separate from many of the intimate details of the things he stands accused of. I know he has committed crimes and I cannot provide a defense for those actions. He has done wrong and he deserves punishment – there is no doubt of this. I am writing strictly to emphasize the positive aspects of his life and character that may have been glossed over during some of these legal proceedings.

As Gregory's brother, I have had a better opportunity to watch and learn who he is than most others that have known him. Throughout my life, I have been privy to his confidences and his thoughts on many occasions, and I have witnessed his behavior in many environments and circumstances. Gregory is a kind and considerate person with little ego or self-importance. He has always shown great empathy and understanding for those around him. He is intelligent, having earned degrees in both History and Teaching, and he has a great passion for these subjects. He enjoys travelling and meeting people, and he has a strong desire to learn new things.

It is my firm belief that, despite his prior actions, if my brother is given leniency and proper support through psychiatry and/or behavioral therapy, he can be fully rehabilitated and be a positive force in the world once again. He has already demonstrated, despite his mistakes, that he is aware of his shortcomings and wishes to help himself, seeking out therapy of his accord when he realized his issues had become too overwhelming for him to handle himself.

Thank you for your honest consideration of this correspondence. If additional discussion is required, please do not hesitate to reach out to me at my email address, cmancini77@gmail.com, or at my personal cell phone, 814-464-7894.

Sincerely,

A handwritten signature in black ink, appearing to read "Christopher Mancini". The signature is written in a cursive style with a large initial "C" and a long horizontal stroke.

Christopher Mancini

141 West Main Road
Conneaut, Ohio 44030
January 12, 2022

The Honorable Susan Paradise-Baxter
Magistrate Judge
U.S. District Court, Western District of Pennsylvania
Erie Federal Court House
17 South Park Row
Erie, Pennsylvania 16501

Dear Judge Paradise-Baxter:

The intent of this letter is to ask for sentence leniency for my cousin, Gregory Mancini.

I am Greg's oldest cousin and I would like to better acquaint you with our extended family in which Greg comes from. I'm certain that you have seen individuals come through your court that have come from families who haven't encouraged positive life choices, who have swayed behaviors in the wrong direction, and who have not had a village behind them. Greg's experience is the exact opposite of that. My extended family, The Priestap family, which includes Greg and his family, is the kind of family you are lucky to come from. We are loud, real, supportive of one another, and we cheer one another on. If you walked into a Priestap family Christmas Eve, you would find that we are a huge group, that people would be yelling over one another to say hello and tell stories, that the hugs would be flying, and that there would be a lot of good food. We are quite loud, but we also love loudly. No one can walk into a family gathering and leave feeling that they are a stranger. (They will also not leave hungry!) In that room you will

find a mixture of folks: several teachers, scientists, business professionals, nurses, service members, retail workers, and even some pastors. You will find a mixture of religions and beliefs, but all members of our family have been raised with a foundation of love, kindness, respect, and religion. We have been taught to put others before ourselves, to care about others, and to spread love where there is darkness. We have been taught to follow our dreams and to make our family proud. We have been built up by our families and have encouraged each other along the way. This is the foundation of our extended family. Greg's immediate family was especially so. My Aunt Cindy is the sweetest person, always caring about everyone and checking in on everyone. My Uncle Sam can strike up a conversation with anyone and he always makes sure people feel welcome. My cousins were raised in a very loving home with two parents to raise them right and to back them up. I have been fortunate enough to know Greg since he has been born, and also to get to babysit both he and his brothers. Greg was a happy kid, and he loved the usual Pokemon cards and sports.

When Greg grew up, I was happy to see him go to college. I was even happier when he chose to go into teaching. We have several teachers, myself included, in the family and Greg had the natural love of learning and joy in being able to help others learn. Greg would sometimes talk to me about lesson plans or about how to deliver a particular lesson. I was so, so proud of him for all of the hard work that he put in to becoming the best teacher he could be! I still remember the Christmas that he waited for me to get there because he had put together his student teaching binder and couldn't wait to show it off to me. It was evident that he had spent weeks perfecting and making sure that he would be the best student teacher out there! When he talked to me about his students, he

would come alive because he was so proud of their successes. He has a true teacher's heart.

What happened after that, I don't know. I was dumbfounded when my mom called to tell me what had happened with Greg. I think we all were. I don't know what happened that caused Greg to make those very poor choices. What I want you to know is that those choices are not in his or in our family's character. Greg is a kind and caring person. He has helped so many people over the years. He makes the best cheesecake of anyone I know. He is a wonderful person who comes from an outstanding family, and Greg made some terrible mistakes. Greg knows that we all still love him and stand behind him, and he also knows that he has to face the consequences of his decisions. He has a loving family to support him throughout all of this. His own family will do whatever it takes to make sure that Greg continues to receive the help that he needs to get better and get beyond this. Our big extended family will continue to love him and support him. Everyone makes mistakes in their lives, and while yes I will admit that some mistakes are much larger than others, I believe that Greg can move past this and move on into a better life.

Your honor, I have three young children. It is the hardest thing in the world for me to sit here and say that I am okay with the choices my cousin made. I adamantly am not. In fact, this would be the type of case where just a few years ago, I would have looked at charges such as these and hoped that the individual would end up in jail forever...But this isn't some monster, this is Greg. My mama heart and my teacher heart hate these charges, but my heart also reminds me of the happy and fun-loving little boy I used to babysit, of the hardworking and proud student teacher who couldn't wait to be an educator, and of the Greg that I have always known and loved. There

is so much hope in Greg, so much light. There is so much GOOD in Greg, and while I'm not sure how he allowed so much bad in for awhile, I am confident that with support and love he can grow the good again. On behalf of my aunt and uncle, who are the two nicest people you'll ever meet, I humbly ask you to show leniency in my cousin Greg's sentence. Please give Greg a chance to keep growing the good in his heart.

Thank you for reading my letter and I apologize for its length. If there is anything else that you would like to know about Greg or any way that I can help at all, please reach out to me. I appreciate your time and consideration.

Regards,

A handwritten signature in blue ink that reads "Heather Eaton, M.Ed." The signature is written in a cursive style.

Heather Eaton, M.Ed.

(440) 344-1806

heather.eaton925@gmail.com

Jessica Clem
2612 Bloomsberry Ridge Dr.
Fuquay Varina, NC 27526

January 7, 2022

The Honorable Susan Paradise-Baxter
Magistrate Judge
U.S. District Court, Western District of Pennsylvania
Erie Federal Court House
17 South Park Row
Erie, Pennsylvania 16501

Your Honor,

I am writing this letter to request sentence leniency in the case against Gregory Mancini. Greg is my first cousin and we grew up together. Reading the charges against him, one does not truly know an individual. He is a compassionate and thoughtful man, always offering assistance to those in need. Unfortunately, the charges against him paint an unsettling image of a "sexual predator," which is simply not accurate.

Greg sustained a significant head injury, when he was a small child, in a motor vehicle accident. Although the proper testing was never done, I believe he suffered a brain injury, at that time. It is my professional opinion, as a Licensed Clinical Social Worker, that injury aided in the development of a mental health disorder, which needs to be properly diagnosed and treated. He is currently not receiving any such treatment, while incarcerated. He will not be able to properly rehabilitate, until he undergoes intensive therapy, which is not available within the prison system.

He is not a risk to society. He has served the past 18 months as a model prisoner, with no infractions. He needs to be released as soon as possible, in order to begin the proper course of treatment. His parents, Cynthia and Samuel Mancini, will ensure that he complies with any recommendations from the court and his treatment team.

Thank you for taking the time to read this and for considering this request.

A handwritten signature in black ink that reads "Jessica Clem LCSW". The signature is written in a cursive, flowing style.

Jessica Clem, LCSW
919-592-8848



February 27, 2022

Attorney Douglas Sughrue
429 Fourth Avenue, Suite #501
Pittsburgh, PA 15219

Dear Mr. Sughrue,

This letter is regarding Mr. Greg Mancini and his time in treatment with our program. Mr. Mancini began therapy with our agency in May 2019. He initially attended individual sessions for the first several months. After his computer was seized in January 2020, it was decided to have Mr. Mancini join group therapy as well. Although he had not yet been charged with his sexual offense, and most likely not complete the program before his incarceration, I felt the group process could help Mr. Mancini in several ways such as: being accountable for his crime; understanding the factors that played a role in his offense; identifying his risk and protective factors; and increasing his empathy. Mr. Mancini attended group sessions on a weekly basis for seven months until his arrest in July 2020. During that time, I found Mr. Mancini to be very responsive to the treatment process. He participated in the session discussions and thoroughly completed his homework assignments each week. Mr. Mancini also appeared to be invested in his groupmates and their well-being as evidenced through his supportive comments and interactions. He was also open to feedback and suggestions from the group re: his crime as well as what to expect once incarcerated. While it is not the norm for men who have committed sexual crimes to join treatment prior to their incarceration, I believe this experience was beneficial to Mr. Mancini and he appeared to be very invested in understanding his behaviors and learning positive ways to manage his deviancy. I am hopeful that his determination to become a better individual will be an asset to him while incarcerated.

If you have any further questions, I would be more than happy to answer them. I can be reached at 814-807-0861, ext 114.

Sincerely,

A handwritten signature in black ink that reads "Chris Laythe".

Chris Laythe, LCSW
Parkside Therapist

558 Young Rd.
Erie, Pa. 16509

December 28, 2021

Dear Judge Paradise & Baxter:

My name is Rebecca Sterbank. My brother is Sam Marconi, the father of Gregory Samuel Marconi, who has been incarcerated at Erie County Prison since July 20, 2020.

It is my belief that what Greg needs is continued professional counselling and not an extended prison sentence.

Greg realized that he had a problem, and voluntarily sought professional help after his arrest. He travelled weekly to Buffalo, New York for months before switching and getting help locally with Parkside Psychological Associates here in Erie.

His goal throughout has been to better understand & overcome his condition. Not just to deal with it, but to break away completely from this addiction.

It is my belief & the belief of his loving family that what Greg needs is continued professional counselling, not prison.

If you would like to contact me regarding my nephew Greg, I can be reached at 814/823-6877 or E-Mail me at RSTERBANK1949@AOL.COM.

Thank you,
Rebecca S. Sterbank

The Corso Law Center
Attorneys
A Limited Liability Company

Arturo Corso
Principal

427 Green Street, N.W.
Gainesville, Georgia 30501

Admitted in
New York, Georgia
and Washington, D.C.

Telephone (770) 532-9732

Facsimile (770) 532-9733

February 24, 2022

Mr. Douglas Sughrue, Attorney at Law
429 Fourth Avenue, Suite #501
Pittsburgh, Pennsylvania 15219

RE: Letter to Judge in support of Greg Mancini

Your Honor,

Greetings. I hope this letter finds you well. I write on behalf of Greg Mancini, who is due to appear in your court on May 6, 2022, to ask for your forbearance and leniency in imposing a sentence.

It was my honor to represent Greg in Gainesville, Georgia where this case first arose. I found Greg to be extremely polite, kind, and forthcoming as we discussed the circumstances of the case. In that regard, he was quite different than many of those whom I have prosecuted or defended in my 25 year legal career. This factor alone inspires confidence in his future actions.

Two different judges here observed him as I did, and he was quickly released on a conditional bond over the initial objection of the assistant district attorney. In the following months, when Greg did so well under pretrial supervision, even the ADA agreed to modify his bond and allow internet access to facilitate his job searches. His excellent behavior while on bond and in reporting to the pretrial services officer is proof positive that he will be an excellent probationer in your case and that he is already well on his way to complete rehabilitation.

Perhaps, therefore, continued incarceration is unnecessary to satisfy the sentencing factors now before you, particularly 18 USC 3553(a)(1)(D). While Greg may be brutalized in prison, if offered proper mental health treatment he will thrive in life and never re-offend. Thank you.

Sincerely,



Arturo Corso
Attorney at Law

4712 North Wayside Drive
Erie, Pennsylvania 16505
January 7, 2022

The Honorable Susan Paradise-Baxter
Magistrate Judge
U.S. District Court, Western District of Pennsylvania
Erie Federal Court House
17 South Park Row
Erie, Pennsylvania 16501

Dear Judge Paradise-Baxter:

I am writing to you asking for sentence leniency for my cousin Gregory Samuel Mancini who has been incarcerated at Erie County Prison since July 20, 2020.

I am Phil Stuczynski, cousin of Gregory Mancini. More than anything I wanted to express my thankfulness to you in this deliberation and sentencing for Gregory, as well as your time even reading these letters and taking them all into consideration. The reality and gravity of this situation is no better exemplified than in what you are currently doing. Please know that I myself have struggled to find the right words of this situation. While I cannot imagine what this process is like for you, know that I have full confidence you will come to the best conclusion for all parties involved.

To elaborate, I come to you as a father of young children. I come to you as a law-abiding man who believes in accountability. I come to you as a Pennsylvania State University graduate who has taken the time to understand the criminal justice system as well as concepts such as morality and responsibility. And I come to you as a God-fearing man who understands in order for liberty to exist, the law must be upheld. With all of that being said, the issue I continue to contend with in my head from a moral standpoint is, "what do we, or rather what does the state owe to Greg at this time?"

Certainly, Greg owns up to his mistakes. Those are known and while there is no way to hide from them, Greg is not attempting to hide. He has sought counseling and has started the process of making amends for his actions. The process of repentance and atonement is underway. I also believe that with the proper guidance in place, as well as the support of his family, Greg has the ability to come back from this issue and right his wrongs. He still has every chance to become a productive and functional member of society while living his life, and at the very least, avoiding becoming another lost cause and burden of the state.

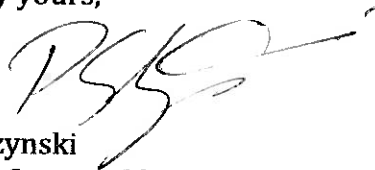
To put it directly, my fear is that any chance Greg has of rectifying past issues, making progress with himself, or conquering his inner turmoil will all become locked away and lost forever along with him. And, instead of making progress, we

will just be pushing another individual behind bars without regard for the content of his heart or his intentions and commitment of purpose moving forward.

Greg's mistakes are real. As a father I recognize and understand this point, and comprehend the severity of the issue. You'll get no quarrel from me along those lines.

However, my hope is that as you go through your judicial process, that you truly consider what would be the best outcome both for the state, and for Greg. I realize you have a job to do, and thank you for bearing the full weight that is placed upon you in this case. I trust in your abilities and know from your reputation and history that you can navigate this case far more easily than I ever could. All I ask in this process is that because this outcome represents the lifetime of an individual who wants to atone, wants to seek help, and move forward, that you consider whether he can be saved.

Very truly yours,

A handwritten signature in black ink, appearing to read 'P. Stuczynski', with a long horizontal flourish extending to the right.

Phil Stuczynski
Cousin of Gregory Mancini

Mrs. Barbara A. Chares
4728 North Wayside Drive
Erie, Pa. 16525

February 14, 2022

Dear Judge Paradise-Bastew:

I am writing in regards to the sentencing of Gregory S. Marcini. My husband, Jon and I have been neighbors with Greg approximately 25 years. Greg has always been a very polite young man. He was a pleasure to be around. I was heartbroken when I was informed of his actions and his incarceration.

I'm writing to ask for sentence leniency. I feel Greg is a troubled

Young man and could really benefit from serious counseling. I'm not sure if while incarcerated that he could get that type of much needed help.

I deeply appreciate your time in this matter. Thank you very much.

Sincerely,

Mrs. Barbara Albese

3110 Morningside Drive
Erie, Pennsylvania 16506
March 13, 2022

The Honorable Susan Paradise-Baxter
Magistrate Judge
U.S. District Court, Western District of Pennsylvania
Erie Federal Court House
17 South Park Row
Erie, Pennsylvania 16501

Dear Judge Susan Paradise-Baxter:

I have known Gregory S. Mancini since he was a small child, the second of three sons of Sam and Cindy Mancini.

I was the best man for Sam and Cindy, who were married in 1981, and I have seen their three boys grow up to be outstanding young men. Chris, the oldest son, and Andrew, the youngest, were both ranked at the top of their classes at Cathedral Prep, and graduated from Carnegie Mellon and Notre Dame respectively. Chris, who is married, and Andrew are both highly respected professionals in their fields as scientists.

Greg was also a very good student at Prep and then Penn State-Behrend, then secured his master's degree in 'Curriculum and Instruction' at Gannon University. He is also a very sports-minded individual like his father.

As a teacher for like skills children ranging from the very young to high school age at the Gertrude Barber Center for four years, he was a well-respected employee touted for his work. He was also an assistant junior varsity basketball coach at Prep, and had coached at several different levels. Greg is also a wizard when it comes to following the Pittsburgh Pirates organization, and I contacted him for a story that I was writing about the Pirates when I was a sports reporter at the Erie Times-News.

Via his career he was able to purchase his own home, but then his world turned with the allegations in Georgia when he was arrested for trying to contact a young man he met online playing a video game.

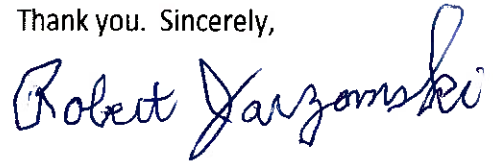
I was puzzled and wondered why Greg would do this, but then several months later I was stunned when he was accused of possessing child pornography. It was horrible judgment on his part and just hard to understand why. It is not right, but somehow a sickness creeps into the minds of good people. And, Greg is a very good person, very caring, and always helpful. He was never accused of any misconduct while at the Barber Center, nor anywhere else.

He has the full support of his loving family, and therapy is available to correct his problem.

Greg has expressed remorse and accepted responsibility for his actions. He has already paid a debt.

It is my sincere hope the court could show leniency at the time of sentencing, and soon be put on probation with therapy so he can go on with his life and resume making positive contributions to society.

Thank you. Sincerely,

A handwritten signature in blue ink that reads "Robert Jarzomski". The signature is written in a cursive style with a large, looping initial 'R'.

Robert Jarzomski

February 25, 2022

Attorney Douglas Sughrue
429 Fourth Avenue, Suite #501
Pittsburgh, PA 15219

Dear Attorney Sughrue,

I am writing to you regarding Gregory Mancini whom you are representing. I am hopeful this letter can be added to the file you are compiling of Letters of Sentence Leniency for Judge Susan Paradise-Baxter who is presiding over Greg's case. I know he will be sentenced in May, and I appreciate the opportunity to ask for leniency on his behalf.

I have known Greg's family for many years, as his father and I went to grade school together, and once we were both married, we shared many years of social and friendly activities as couples. I am godmother to Greg's younger brother, Andrew, and have known the three Mancini sons since they were born. My knowledge of Greg's background and the good, solid, stable family they are and from which he came, is extensive. I knew Greg's journey through school, getting his college degree and masters and his various employment positions.

I cannot explain what happened with Greg or why he traveled down this terrible journey. To say it was shocking and disappointing seems understated, but I have supported his family as have many others these past three years. I do know of others that have made serious mistakes and have battled various addictions. I truly believe in giving people the help they need, if they truly want it and seem sincere in trying to overcome their past. I believe in second chances and know many have done amazing things with their lives when allowed to have them and been given support to do so.

I believe more years incarcerated will not help Greg to overcome what he is battling as well as counseling and a good therapist can do, and the sooner he can be free to pursue those avenues of help and support, the better chances he will have to overcome them and put his life's path on a better one, hopefully with good outcomes for himself and others along the way. He has had to learn many lessons through this journey, hopefully lifelong ones that will serve him well, and help him help others as I truly believe he will.

Thank you for your consideration of my comments. I believe in the justice system, and remain hopeful that Greg will serve out his time and become an active community member with a good life ahead of him.

Sincerely,



Denise R. Lorei

February 18, 2022

The Honorable Susan Paradise-Baxter
Magistrate Judge
U. S. District Court, Western District of Pennsylvania
Erie Federal Court House
17 South Park Row
Erie, Pennsylvania 16501

Dear Judge Paradise – Baxter,

I am writing to you asking for leniency for Greg Mancini.

As a mother of four adult children, I have a very heavy-heart writing this letter. No one can prepare you or your heart for times like these.

We have been neighbors with the Mancini family for 28 years. Our neighborhood is the type Norman Rockwell would paint. My sons all went to the same high school as their sons and the Mancini family was very active in the school community. They volunteered with schools sporting events and attended fundraisers. The Mancini family has always been the kind of family you could go to if you need help.

Greg was always a cheerful and talkative young boy and young adult. He would ask how everyone in our family was doing - he is kind like that. When my youngest son was struggling in high school, Greg gave him suggestions on how to speak to his teacher and followed up with him while my son was playing basketball outside.

Although I may not fully understand how Greg arrived to this point in his life, I believe there is good in everyone and I am asking that you give Greg this chance at a new life – like being reborn.

Sincerely,



Margaret McCaslin

FILED

FEB 24 2022

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

Exhibit A

5933 Shady Hollow Dr

Erie, PA 16506

February 16, 2022

The Honorable Susan Paradise-Baxter

Magistrate Judge

U.S. District Court, Western District of Pennsylvania

Erie Federal Court House

17 South Park Row

Erie, Pennsylvania 16501

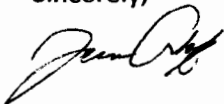
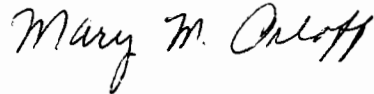
Dear Judge Paradise-Baxter,

Our names are James and Mary Orloff and we are writing this letter on behalf of Gregory Mancini. My wife and I have known Greg for over 25 years. Our oldest son James attended school with Greg from first through twelfth grade. They participated in many activities throughout the years. I was even his baseball coach for a couple years. He always showed respect to me and his teammates. We have always known Greg to be a good and kind person in school and in the community.

We are very well aware of the charges that he is facing and the consequences. Greg is a very compassionate young man who has a lot of good in his heart.

We would like to ask for lenience in this matter and hope you would consider this character reference letter before deciding a sentence.

Sincerely,

James Orloff and Mary Orloff

1:20-cr-031

Mary Beth Passauer
3630 Fountain Way
Erie, PA 16506

FILED

January 25, 2022

IAN 28 2022

The Honorable Susan Paradise-Baxter
Magistrate Judge
U.S. District Court, Western District of Pennsylvania
Erie Federal Court House
17 South Park Row
Erie, PA 16501

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

Dear Judge Paradise-Baxter,

I am writing today to request that you consider sentence leniency for Greg Mancini.

Although I have had limited contact with Greg over the past 10 years or so, the person I knew was kind and supportive. During grade school/high school, I remember clearly a situation where Greg stood up for my son. Classmates were putting my son down and Greg supported my son, going against their peers.

He was also willing to share his basketball knowledge with my husband as he attempted to coach a high school team. Greg didn't hesitate to spend his evening with my husband and share his coaching strategies.

Greg was also very polite whenever I did run into him.

The examples reflect characteristics that Greg possesses.

The charges are horrific and certainly require consequences. I do believe that only extensive mental health counseling will allow Greg to resolve this addiction.

Your consideration in this matter is greatly appreciated.

Thank you,



Mary Beth Passauer
Family friend of Greg Mancini

685 Huntington Drive
Erie PA 16505
March 25, 2022

The Honorable Susan Paradise-Baxter
Magistrate Judge
U.S. District Court, Western District of Pennsylvania
Erie Federal Court House
17 South Park Road
Erie, PA 16501

Dear Judge Paradise-Baxter

I am writing to you to ask for sentence leniency for Gregory Samuel Mancini. This is a difficult letter to write. The charges are serious. Greg is my Godson.

Greg was just an average kid, the middle child with two extremely brilliant siblings. I long felt Greg had self esteem issues. His parents treated him no differently except for maybe having to push a little at times to be sure school assignments were completed on time and he was prepared for his exams. I tried to encourage him by reminding him of his unique talents. He always was very thorough in research of local history, is a talented baker, and has always been supportive of others and their achievements.

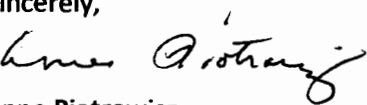
I fear that video gaming led Greg to this dark place. His strong analytical skills enabled him to feel the thrill of winning, of being special. I believe it also led that child in Georgia to look up to him and trust him.

Sadly most of Greg's friends have had to distance themselves from him due to the seriousness of the charges and their careers that associate with children. I worry now who will be there to support Greg after his incarceration. I am now 69 years old. My husband is 68. If a lengthy sentence is imposed, the infirmities that come with our advancing age could prevent us from supporting Greg as he tries to start over.

It was hard to watch the January hearing where Greg pled guilty to all of the charges. But I do believe he is taking responsibility for his actions which is the first step in facing the demons that led him here. He made no excuse.

I hope and pray that Greg will receive professional services to overcome his condition and help him with a new start. Greg is a caring individual but will need a new direction. I hope to be part of his journey.

Sincerely,


Anne Piotrowicz

685 Huntington Dr.
Erie, PA 16505

The Honorable Susan Paradise-Baxter
Magistrate Judge
U.S. District Court, Western District of Pennsylvania
Erie Federal Court House
17 South Park Row
Erie, Pennsylvania 16501

January 31, 2022

Dear Judge Paradise-Baxter;

I am writing this letter in support of Gregory Samuel Mancini, who has been incarcerated at Erie County Prison since July, 2020. I am a long-time friend of Greg's father, Sam, and my wife and I are Greg's godparents.

Obviously, I have known Greg for his entire life, and, after what can only be described as a normal childhood (to my knowledge), I had the opportunity to coach him in Little League baseball when he was 10 years of age. He wasn't the best player, but he tried hard and worked at improving his skills. We never had any behavioral issue of any kind while coaching him. He was very much the typical young boy, very interested in sports like baseball and basketball as a participant, and many others as a spectator.

The only thing that stood out to me that wasn't part of a normal childhood was Greg's (in his own mind) comparatively meager accomplishments academically compared to his 2 brothers. Being considered the "dummy" in the family always opens a person up for self-doubt. Although Greg achieved a couple degrees, he was an average student in comparison to his siblings. Although he rarely verbalized feelings of inadequacy, it was obvious that was the case when he spoke on the subject of his brothers and what they accomplished academically and in their professions.

Later, after college, Greg served as an assistant coach (for me as head coach) for 3 years helping me with coaching an elementary school basketball team (grades 5-6) at a local parochial school. During that time, I had not a single complaint about his behavior or any of his interaction with the players we coached, their parents or their families. I found him to be helpful, supportive, loyal, knowledgeable, hard-working and inventive in the ways of the game. He independently researched and studied various facets of the game in order to be a better consultant on strategies and tactics. His effort went above and beyond that of other assistants I've had. He was such a good assistant, in fact, that he moved on to coach at higher levels. His goal was always to help the players and the team improve their performance. Coaching any youth sports team is a time-consuming endeavor, and Greg was always willing to give of his time and effort.

I am not intimately knowledgeable about the details of Greg's current situation. Suffice it to say that I was shocked when I first heard of what he had been accused of. I never saw him as that kind of person. I have spoken with him about the situation since his arrest, and he has acknowledged that he is aware he has a problem and has been positive about the counseling that he has been undergoing. He has indicated that he feels he is making large strides and major improvements toward beating his addiction.

I am requesting that you consider leniency in Greg's sentencing. I believe that he has recognized his issue and has taken steps to correct his behavior. I think that continued professional counseling would be a better alternative to turning his life in a positive direction than a long prison sentence. He's always been what I consider a good kid, and, based on what he and I have discussed, he has certainly woken up to the error of his ways and realized a lot about what he must do to improve. I have tried to be a sounding board for him during his incarceration and I would do everything I could to help him stay on the right path when he returns to his normal life.

Thank you for taking the time to read my letter.

I would welcome any inquiries you may have about my experiences or relationship with Greg. I can be reached at (814)397-0693 or via email at larryp13@velocity.net.


Larry Piotrowicz

1424 Asbury Rd.

Erie, PA 16505

The Honorable Susan Paradise-Baxter

Magistrate Judge

U.S District Court, Western District of Pennsylvania

Erie Federal Court House

17 South Park Row

Erie, PA 16501

Dear Judge Paradise-Baxter,

We are writing to you asking for sentence leniency for our neighbor Gregory Samuel Mancini who has been incarcerated at Erie County Prison since July 20, 2020.

We have known the Mancini family for almost thirty years, as they live in our neighborhood. Greg and our son, James have been friends since the age of 3.

Greg spent much time at our home and James in his. We have enjoyed his company and felt that he came from a very loving home. I often thought of Mrs. Mancini as our son's other mother and Greg also said that about Betty.

As the boys grew up, they played baseball together for many years, some of which Greg's father coached. He taught them good sportsmanship and team work which helped build their characters. Greg was a respectful boy and young man.

As Greg and James grew older they went to different high schools, but occasionally still spent time together. When James moved to Pittsburgh for college, we saw Greg less often.

We were honestly shocked to hear of Greg's addiction and legal issue. We knew him as a good student and a church going young man.

We know his parents were also shocked and heart broken. Greg recently wrote James a letter, thanking him for his support to him during their youth and his appreciation of their friendship. He explained that he is working on himself in prison to be a better person and is getting counseling.

We were impressed with this letter and his openness. I, Betty, have worked many years with addictions as an RN and have seen miraculous changes in those people who wish to change. I believe Greg is one of them.

From what his parents tell us, Greg is making the best of his prison time and not falling into despair as one might expect in this situation. I believe he is aware of his supports including his faith and is making the mental changes required to turn his life around.

From what we know of Greg's history, he has not gotten into trouble at his places of employment or as a coach. We believe he sincerely wants the best for those in his care and will once again be a productive person in society and a positive influence on others.

It is our sincere hope that you will be lenient with his sentencing.

Thanks for reading our letter and for this consideration.

Sincerely,

Betty and Jim Dalessandro

Handwritten signatures of Betty Dalessandro and Jim Dalessandro. Betty's signature is in a cursive script, and Jim's signature is also in cursive, appearing to be 'Jim Dalessandro'.

January 24, 2022

The Honorable Susan Paradise-Baxter
Magistrate Judge
U.S. District Court, Western District of Pennsylvania
Erie Federal CourtHouse
17 South Park Row
Erie, Pennsylvania 16501

Dear Judge Paradise-Baxter,

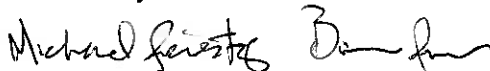
I am writing in regards to Gregory Samuel Mancini who has been incarcerated at Erie County Prison since July 20, 2020. He will be sentenced in May of 2022.

We are Greg's aunt and uncle and have always known him to be hard working, driven and successful. We have also watched him attain worthwhile achievements in his life as well as contribute to society along the way. All the more reason why it has saddened us to observe his shortcomings and series of poor choices leading to his incarceration and sentencing.

I am writing to request that whatever sentence you would deem as fair would be imposed, but not without the consideration of providing the best possible treatment for Greg's condition. To receive a lengthy prison sentence as punishment only, would seem to rob him of the healing that could potentially be achieved through proper rehabilitation and counseling. Therefore, we highly implore you to consider directing him to the best possible facility where he could experience some help, hope and healing in the midst of the criminal actions for which he is taking responsibility.

Thank you for your time.

Sincerely,

Handwritten signatures of Michael and Barb Priestap in black ink.

Michael and Barb Priestap
135 Moore Road
Waterford, Pennsylvania 16441

4064 Cherry Blossom Drive
Erie, Pennsylvania 16510
January 7, 2022

The Honorable Susan Paradise-Baxter
Magistrate Judge
U.S. District Court, Western District of Pennsylvania
Erie Federal Court House
17 South Park Row
Erie, Pennsylvania 16501

Dear Judge Paradise-Baxter:

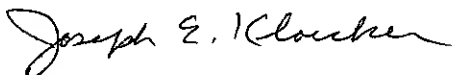
I am writing to respectfully ask you to consider leniency in your sentencing of Gregory S. Mancini, who has been incarcerated in the Erie County Prison since July 20, 2020.

I am a long-time close friend of the family. I have known Gregory's father since our fraternity days at Gannon University and I have maintained a close friendship with both Sam and Cindy for over 47 years. Thus, I have known Greg and his two brothers since birth. Over the years, Greg, Sam and our group of friends have had a shared interest in following our mutually favorite high school, college and professional sports teams. I have always enjoyed my interactions with Greg and his family. Of course, I was shocked to learn of his serious personal problems. Shocked because I think I'm a good judge of character and never once got a hint of any of this in his character, and shocked because I know how much I have admired Sam and Cindy in their parenting of their three sons. I know the values of this family well. However, I certainly understand the seriousness of Greg's issues and his actions that have come to light. I'm sure you are keenly aware of his sincerity in accepting responsibility for his actions and commitment for ongoing, comprehensive counseling, therapy and court supervised monitoring.

I firmly believe that Gregory is a very good person at heart with a serious addiction. I also believe that since he has so many great values and character traits, that he will benefit greatly from ongoing intensive counseling and therapy. Like any addiction, the individual must want to be successful and if there is a sincere commitment, it is possible to rehabilitate the person to be a truly good member of society. I firmly believe Gregory has the personal commitment as well as a strong family and friend support system to solve his significant problem.

Thank you Judge Paradise-Baxter, for taking the time to read this letter and for your consideration of some degree of leniency in your sentencing. I plan to attend the hearing in support of Gregory.

Sincerely,



Joseph E. Kloecker, MBA, CPA

(814) 882-5402 kloeckeralley@roadrunner.com

Grant E. Miller
5902 Stonebridge Drive
Erie, PA 16506
814-449-2346

January 1, 2022

The Honorable Susan Paradise-Baxter
Magistrate Judge
U.S. District Court, Western District of Pennsylvania
Erie Federal Court House
17 South Park Row
Erie, Pennsylvania 16501

Dear Judge Paradise-Baxter:

I am writing you today asking for sentence leniency for a very dear and close friend of our family, Gregory Samuel Mancini who has been incarcerated in Erie County Prison since July 20, 2020.

First and foremost, I certainly understand that Greg must be sentenced and receive punishment for what has occurred.

I have personally known Greg and his family for most of Greg's entire life. Greg and my son Grant (G.T.) Miller played sports together since 3rd or 4th grade and were classmates at Cathedral Prep. I assisted Greg's father Sam in coaching Greg's & G.T's baseball team for several years when the boys were young. Greg also coached basketball alongside my son for several years at Prep once they graduated.

For more years than I can remember Greg has coached and participated in sports. I have personally seen him work with and help develop countless numbers of student athletes. Prior to his current situation he was a teacher and also was responsible for working with students who had severe behavior and/or mental health issues. It takes a special person to work with those type of students but Greg did so with much dedication and compassion.

My family and myself have spent so many happy times with Greg and his family over the years. We have traveled to sporting events together, had many, many dinners with each other and truly enjoyed every moment we have spent with them.

Greg and his entire family are wonderful, genuine, caring people that I am truly proud to call my close friends.

I have never written a letter like this for anyone else in my life. I know Greg has so much goodness inside of him. Greg understands he had a problem and wants to overcome this condition that made him behave the way he did.

I believe so deeply in my heart that once Greg serves his sentence he will once again be a good, caring man that will lead a productive life. I feel a long sentence would destroy this young man's future life and if anyone ever deserved a second chance at redeeming himself.....that person is Greg Mancini.

I understand that you must deliver appropriate justice. I also know you are a wise and honorable Judge with great experience and many years of honorable and valuable service on the bench. I pray that you will see the good in Greg and deliver this young man a lenient sentence.

If I can provide any other information that would assist you please feel free to contact me at any time. 814-449-2346 Grant@CoolRenewMedSpa.com

Sincerely,

A handwritten signature in black ink that reads "Grant Miller". The signature is written in a cursive, flowing style.

Grant Miller

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA,

CRIMINAL DIVISION

vs.

Criminal No. 1:20-cr-00031

GREGORY S. MANCINI,
Defendant.

Judge Susan Paradise Baxter

ORDER OF COURT

AND NOW, this the _____ day of _____, 2022, Defendant, Gregory S. Mancini, having filed motion for a variance and the Court having given the matter due consideration, the motion is GRANTED.

By the Court:

Susan Paradise Baxter
United States District Judge