

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :
 : Case No. 1:21-cr-00278-2 (BAH)
v. :
 :
DANIEL HERENDEEN, :
 :
Defendant. :

GOVERNMENT’S SUPPLEMENT TO AMENDED SENTENCING MEMORANDUM

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully submits this supplement to its amended sentencing memorandum in connection with the above-captioned matter for the reasons that follow:

1. Following the filing of the Government’s Amended Sentencing Memorandum, counsels for the government and the defendant engaged in a discussion regarding allegations made by the government in its Amended Sentencing Memorandum. As the result of the discussion, the government seeks to make the corrections set forth herein.

2. In its Amended Sentencing Memorandum, the government represented that Herendeen planned to take a gun with him to Washington, D.C. The parties now agree that rather than a gun, Herendeen had indicated an intent to take a knife to Washington, D.C.

3. The government represented that Herendeen had failed to provide documentation regarding his business income to the Probation Office. This was incorrect as Herendeen provided the requested information prior to the preparation of the final Presentence Investigation Report.

4. The government represented that Herendeen had failed to show remorse for his criminal conduct. This representation was inaccurate and should be disregarded by the Court. Herendeen has indeed shown remorse.

5. The government represented that Herendeen offered to sell video that he recorded inside the Capitol. Because this representation was made during an off-the-record proffer, rather than an on-the-record, it should be disregarded by the Court.

Respectfully submitted,

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