

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

**21-CR-384 (CJN)
Sentencing: November 4, 2021**

JONATHAN SANDERS

MEMORANDUM IN AID OF SENTENCING

Jonathan Sanders, by and through undersigned counsel, does hereby submit the following Memorandum in Aid of Sentencing:

I. PROCEDURAL BACKGROUND

Jonathan Sanders is before this Court for sentencing following his arrest for involvement in the January 6, 2021 events at the United States Capitol. At the outset, Mr. Sanders profoundly apologizes for his involvement in the events at the United States Capitol and fully accepts responsibility for the conduct that brings him before this Court for sentencing.

Mr. Sanders was arrested on May 25, 2021 in Vincennes, Indiana and was released on his own personal recognizance. He has faithfully abided by every condition of his release since his arrest and there is every

reason to expect that Mr. Sanders will fully comply with any and all conditions that are imposed upon by this Court at sentencing on November 4, 2021.

On June 2, 2021, the United States filed a four count information charging Mr. Sanders with Entering and Remaining in a Restricted Building in violation of 18 U.S.C. §1752 (a)(1); Disorderly and Disruptive Conduct in a Restricted Building in violation of 18 U.S.C. § 1752 (a)(2); Violent Entry and Disorderly Conduct in a Capitol Building in violation of 40 U.S.C. § 5104 (e)(2)(D); and Parading, Demonstrating or Picketing in a Capitol Building in violation of 40 U.S.C. § (e)(2)(G).

On August 26, 2021, Mr. Sanders entered a plea of guilty to one count of Parading, Demonstrating, or Picketing in a Capitol Building in violation of 40 U.S.C. § 5104(e)(2)(G) (Count 4). The remaining three counts of the Information were dismissed. At the plea hearing conducted before this Court, Mr. Sanders freely admitted to his involvement in the charged offense and completely took responsibility for the conduct which brought him before the Court. Mr. Sanders did not place the blame for his conduct on any third person and continues to fully accept responsibility for his actions.

II. THE PERSONAL BACKGROUND OF JONATHAN SANDERS

Jonathan Sanders appears before this Court as a 61 year old man with no prior history in the criminal justice system. He was born on October 7, 1960 in Indiana. Mr. Sanders has two siblings and was raised by his father who passed away at age 53 from pancreatic cancer and his mother who passed away at age 87 from congestive heart failure. Mr. Sanders' father served in the United States Army in the Korean War and received an Honorable Discharge. Both of his parents were loving and caring individuals who instilled in Jonathan Sanders a profound work ethic and he has carried that ethic with him throughout his lifetime.

Jonathan Sanders has been married to Susan Sanders for 40 years and she is employed by the Niehuas Lumber Company as an Accounts Payable Manager. Ms. Sanders is also a military veteran. Mr. and Mrs. Sanders have enjoyed a loving and supportive marriage including the stress he sustained during her deployment to Irag (Mr. Sanders' military career is discussed in the next next paragraph). Mr. and Mrs. Sanders are the proud parents of two grown children, Carissa Rodgers age 35 and Jonathan Ace Sanders II, age 33. Carissa Rodgers is employed by the Department of Child Protective Services as a Case Manager and Jonathan Ace Sanders, II is employed as a Parts Manager for Yokum Chrysler Dodge. Defendant has one grandchild from his daughter.

Jonathan Sanders is very close to his entire family and spends a substantial amount of time being the caretaker for his granddaughter allowing the parents to work full-time.

III. JONATHAN SANDERS' LENGTHY AND VOLUNTARY MILITARY SERVICE TO THE UNITED STATES

Jonathan Sanders enlisted in the United States Air Force in 1981. He retired from the United States Air Force in 2001 having achieved the rank of Master Sergeant and received the following commendations during his service:

1. A Purple Heart;
2. Two Meritorious Service Awards;
3. Three Aerial Achievement Awards;
4. Six Commendation Medals;
5. Three Armed Forces Expeditionary Medals;
6. One Humanitarian Medal

IV. POST-MILITARY ACTIVITIES OF JONATHAN SANDERS

Following his retirement from the United States Air Force, Mr. Sanders was employed by Lewis Bakeries, Inc. in Vincennes, Indiana as the Human Resources Manager. He was employed in that position for approximately twenty years and retired in May 2021. Mr. Sanders currently provides child care assistance for his infant grandchild.

Jonathan Sanders is an active and legal hunter. Each year he takes a Mormon family on an elk hunting trip to Colorado.

V. THE EVENTS OF JANUARY 6, 2021

The riot that occurred at the United States Capitol has been well documented. Jonathan Sanders recognizes that the events of January 6, 2021 were a terrible tragedy for those people who were injured and an immense assault against democracy in the United States.

Jonathan Sanders, along with two friends, traveled to Washington, D.C. on January 5, 2021 to attend a rally in support of then President Donald Trump. He agreed in principle with comments made by Senator Ted Cruz that an audit should be conducted in order to determine whether there had been voter fraud in the presidential election of 2020.

Mr. Sanders accompanied the crowd as it walked to the United States Capitol and entered the building along with other members of the crowd. He took cellphone videos of the interior of the United States Capitol and sent the videos to friends of his.

VI. SUPPORT FROM MEMBERS OF THE UNITED MILITARY AND MEMBERS OF THE COMMUNITY

Attached are letters of reference from the following individuals on behalf of Jonathan Sanders (Exhibits 1-3):

1. Retired LTC USAF Matthew J. Sweeney has known Mr. Sanders for the past fifty years while working at the Department of Defense and in civilian life. Exhibit # 1.

Mr. Sweeney attests to the significant work ethic of Mr. Sanders, commitment to community and his love for the United States. In addition, Mr. Sweeney addresses the willingness of Jonathan Sanders to sacrifice his life for his country and fellow citizens and the high esteem he is held in within his hometown. The attributes of Jonathan Sanders are present in both his civilian life and his military life.

2. Reference letter from Stacy Blue, H.F.A. Exhibit #2. Ms. Blue is a longtime friend of Mr. Sanders and attests to his dedication to community and country. She describes his volunteer work and commitment to the betterment of the youth in his neighborhood. She concludes by saying “ I have personally witnessed his lifetime of achievement and compassion with an emphasis on integrity.”

3. Reference letter with long-time friend Kelley Hopwood. Exhibit # 3. Ms. Hopwood, similarly to Stacy Blue describes Mr. Sanders as a gentleman, a family man and a man who served his country while in the United States Air Force.

CONCLUSION

Jonathan Sanders is an immensely productive and honorable man who has never before had contact with the criminal justice system. He is a beloved family man and one who is held in high regard by a range of members of his community. He deeply regrets the events of January 6, 2021. His actions have caused an emotional and financial toll on him. It is very evident from the past conduct of Mr. Sanders that he will never again engage in any type of wrongful behavior.

A sentence exclusively of probation is respectfully prayed for. It is submitted that a period of probation is adequate punishment in the context of the life of Jonathan Sanders. The probationary period, consistent with 18 U.S.C. § 3553, is sufficient but not greater than necessary, to address the single count of criminal conduct that Jonathan Sanders immediately agreed to enter a plea of guilty to.

Respectfully submitted,

_____/s/_____
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and accurate copy of the foregoing was served via the Court's electronic system, on this the 28 day of October, 2021 upon the Office of the U.S. Attorney, Assistant U.S. Attorney Mona Furst.

_____/s/_____
Steven R. Kiersh