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November 7, 2023

VIA EMAIL AND ECF

The Honorable Vincent L. Briccetti
United States District Court Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: *United States v. Anthony Jacobs*, 23-cr-413 (VB)

Dear Honorable Judge Briccetti:

I respectfully submit this letter in support of a downward variance for Mr. Jacobs's sentencing scheduled before this Court on November 21, 2023, at 11:00 a.m.

I. The JSIN Materials Should Not be Included in the Pre-Sentence Report ("PSR")

Mr. Jacobs objects to the inclusion of JSIN data here as insufficiently reliable for the Court to take into account for sentencing. Such statistical information is not listed in Federal Rule of Criminal Procedure 32 or in Monograph 107 as one of the items that must be in a Presentence Report. More importantly, while properly conducted statistical analysis may be quite relevant to sentencing in certain cases, the data as presented in this case are skewed upward and therefore misleading.

Although the reason for these being included in the PSR is not explicitly stated other than this District was chosen as part of a pilot study, it appears this information is being offered to provide information about defendants similarly situated to Mr. Jacobs. However, this information is not reliable for several reasons, as detailed below, which skews the data upwards suggesting a longer prison sentence.

- The JSIN data includes only "length of imprisonment," rather than "sentence length." As a result, both probationary sentences and alternative confinements are excluded, skewing the results upward.

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- The JSIN data accounts for “time served” sentences differently than probationary sentences, treating the number of months served prior to sentencing as the sentence intended by the judge, even if the intent of the judge was to impose a noncustodial sentence.
- Sentences with § 5K1.1 departure are excluded. This skews the data away from 0, when underlying conduct is arguably similar.
- Career offenders and defendants facing mandatory minimums are automatically included.
- The data here includes only national results. Due to regional differences, for example in how state cases enhancing the federal guideline range are prosecuted, data from this district as well as from the Second Circuit should also be included if any statistics are to be considered.
- The data presented here only include the last five years. It should instead include all the available data, going back at least ten years.
- JSIN “averages” omits information on where sentences fall within the guideline range. There is nothing inherently wrong with an average as a standalone descriptive statistic, but statistics are not neutral. It is only natural to project onto a statistic certain assumption about a group of say, similarly situated defendants.
- JSIN relies on different data than are publicly available from U.S.S.C. or on additional unstated parameters. Federal defender organizations and the Sentencing Resource Counsel analysts have tried to replicate JSIN. It is not clear what else is determining their values.

In sum, JSIN provides aggregate statistics for all defendants that fall in a particular guidelines cell (offense level and criminal history category), but the offenders included in this cell are not necessarily “similar” and there is no way to determine in which ways they are similar or dissimilar. On the contrary, for the reasons noted above, the data is skewed upward in a way that cannot be accounted for. JSIN is a data tool and with all data tools, the developer’s choices of what data to include, exclude, report, and not report will affect the tool’s results. Due to the Commission’s choices within JSIN, the tool’s default makes it seem like judges impose more severe sentences than they actually do. The inclusion of this information in the report is therefore misleading and contrary to an individualized assessment of defendants to

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be sentenced, as required under 18 U.S.C. § 3553(a) and the Due Process Clause. It is also unclear how BOP will utilize this information in assessing Mr. Jacob's security classification. For these reasons, this data should not be included in the PSR, and the Court should not place substantial weight on the JSIN data presented in this case.

II. The Nature and Circumstances of the Offense

On February 12, 2023, at 1:00 in the afternoon, Mr. Jacobs took a car service, which picked him up at his home, the same address on file with his probation officer, and drove him to a bodega in Yonkers. PSR ¶¶ 9, 10. Mr. Jacobs entered the bodega and went to a backroom before re-entering and going to the front of the store and spoke to a man in the store. *Id.* ¶ 10. He waited for a woman to purchase a six-pack of beer and leave the bodega. *Id.* After she left, he quickly walked to the front counter, brandished a gun, and demanded all the money in the register. *Id.* The clerk opened the register and gave Mr. Jacobs \$200. *Id.* Mr. Jacobs left the bodega and rushed toward the car service vehicle that had dropped him off and left. *Id.* ¶ 11.

III. History and Characteristics of Mr. Jacobs

Mr. Jacobs was born on June 15, 2003, to Kesha Gist and Anthony Jacobs. *Id.* ¶ 43. He is their only child. *Id.* ¶ 45. He is the youngest in his family, with two older paternal half-sisters, and an older maternal half-brother who is deceased. *Id.* ¶¶ 46, 47. His half-sisters were primarily raised by their mother, but Mr. Jacobs was raised along-side his older half-brother, Donovan Rose, and the two were close. *Id.* His father worked in the construction and maintenance fields and his mother works as a manager at a hospital. *Id.* ¶ 44.

Mr. Jacobs was raised in a residential area in Yonkers with his family. *Id.* ¶ 48. His home was a loving and supportive environment. *Id.* ¶ 56. He felt particularly close to his father growing up but became closer to his mom as he grew older. *Id.* ¶ 48. He enjoyed participating in community basketball program at the YMCA during his childhood starting when he was 6 years old. *Id.* ¶¶ 48, 56. He stayed active with sports throughout his childhood. Letter from Kesha L. Gist, dated October 27, 2023, attached hereto as Exhibit A.

When Mr. Jacobs was in early adolescence, the family relocated after his parents separated for a period. *Id.*; PSR ¶¶ 48, 56. Although his parents eventually reconciled, they stayed in this new area of Yonkers and soon learned that it was one where drug activity and violence were prevalent. Exhibit A; PSR ¶¶ 48, 56. He frequently saw drug sales and people

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using drugs in his neighborhood. PSR ¶ 48. With the drug activity, there was violence as well. Although he did not witness any shootings, he was aware of them occurring in his neighborhood, and he witnessed people being assaulted. *Id.* He was also the victim of a robbery when he was 14 years old during which he was stabbed in the right leg and right ribcage. *Id.* ¶¶ 48, 57. He received stitches for these injuries and has scars on both his leg and abdomen as a result. *Id.* ¶ 57. No one was ever arrested for the robbery or assault. *Id.*

Following this move, Mr. Jacobs started demonstrating behavioral issues. *Id.* ¶¶ 48, 56. He would leave school without permission and argue with teachers. *Id.* ¶ 48. Due to his behavioral issues, he was unable to play basketball for his school team. *Id.* He began smoking marijuana when he was 15 years old and began spending time outside his home. *Id.* ¶¶ 48, 61. He continued to smoke marijuana until his arrest here. *Id.* ¶ 61.

He left school in the 8th grade after being arrested at the age of 14. *Id.* ¶¶ 32, 65. Within six months he was arrested again and sentenced to a year of residential placement. *Id.* ¶ 33. While in the custody of the New York State Office of Children and Family Services (“OCFS”), when Mr. Jacobs was 15 years old, his older brother Donovan died at the age of 25 from complications from epilepsy. *Id.* ¶¶ 33, 47. Mr. Jacobs was permitted to attend a private funeral under escort and then returned to custody following the funeral. *Id.* ¶ 47.

He eventually obtained his GED while in custody. *Id.* ¶ 67. He met Erica Scott when he was 15 years old, and they dated on and off since that time. *Id.* ¶ 51. When he was 16 years old, he started using Percocet and took it on a weekly basis. *Id.* ¶ 62. He started using one pill or half a pill, but that usage increased over time. *Id.* He also began consuming “lean” a mixture of promethazine and codeine. *Id.* ¶ 63.

When he was 17 years old, he began a relationship with Makaila Mason, whom he dated for two years. *Id.* ¶ 49. They share a son together who was born in 2021. *Id.* ¶ 50. Their son resides with her, and Mr. Jacobs had regular contact with his son prior to his arrest. *Id.* Shortly after he became a father, Mr. Jacobs lost his own father. *Id.* ¶ 44. His father died in December 2021 at the age of 52 due to complications from COVID-19. *Id.* Mr. Jacobs struggled after losing his half-brother and father in untimely deaths within a short time frame. *Id.* ¶ 56. Following the death of his father, his use of Percocet increased to daily use as he tried to cope with the death of his father. *Id.* ¶ 62. He was using four pills of Percocet daily at the time of his arrest here. *Id.* His

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usage of lean also increased to multiple times of day, every day. *Id.* ¶ 63.

After he and Ms. Mason ended their relationship, he began seeing Ms. Scott and has dated her since last summer. *Id.* ¶ 51. They have a son together who was born earlier this summer while Mr. Jacobs was in custody for this case. *Id.* ¶ 52. It was difficult for Mr. Jacobs to not be able to be present for the birth of their child. *Id.* He has only seen his son at court appearances, and they are still trying to coordinate a visit together at MDC where Mr. Jacobs is currently housed. *Id.*

IV. A Downward Variance Would Provide a Sentence That is Sufficient, But Not Greater Than Necessary

The overriding sentencing principle, set forth in 18 U.S.C. § 3553(a), is to “impose a sentence that is sufficient, but not greater than necessary” to comply with the purposes of sentencing, which are retribution, deterrence, public protection, and rehabilitation. Imposing a downward variance here would provide a sufficient, but not greater than necessary sentence as it would reflect the serious nature of the offense, promote respect for the law, and provides a just punishment for the offense given the equities outlined below.

A. Mr. Jacob’s Childhood

Mr. Jacobs was fortunate to have grown up with two loving parents who provided him a stable environment. However, at a critical stage in his development, the family moved from their residential neighborhood to a more violent neighborhood that was plagued by drug activity and violence. At the age of 14, he was the victim of a serious robbery during which he was stabbed twice and suffered significant injuries. Mr. Jacobs quickly became enmeshed in this community. He began using drugs, which only increased with time as he began getting arrested more frequently. The trajectory of his life is particularly devastating because he appears to have been an excellent student with a bright future. *Id.* ¶ 56; Exhibit A.

During this time, he suffered two profound, untimely losses. His half-brother, the only sibling he had been raised with, died during an epileptic seizure at the age of 25. Mr. Jacobs was only 15 years old at the time, and because he was in custody, he could not be with his family to grieve. He was permitted to attend a private funeral while being escorted but was not otherwise permitted to be with his family during that difficult time. Within three short years, his father, who was only 52 years old, passed away due to complications from COVID-19, shortly after Mr.

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Jacobs himself had become a father. This was particularly devastating for Mr. Jacobs as he was the youngest of his siblings and the closest to their father. Letter from Chalane Robins, attached hereto as Exhibit B. These two untimely losses of family members that were central to his world had a profound impact on him. It was difficult for his mother to see how this was impacting him as she too was mourning the loss of her eldest son and her husband. Exhibit A. He has never really addressed the impact of these losses and how they have shaped him. Exhibit B; Letter from Denice Enders, dated October 27, 2023, attached hereto as Exhibit C. Instead, he self-medicated with Percocet and lean.

B. Untreated Drug Addiction

Mr. Jacobs struggled with drug usage in his early teen years. His usage of marijuana, but more significantly Percocet and lean, appears to have skyrocketed following the death of his brother and father. Unable to process these feelings, he numbed himself with drugs to avoid having to deal with these losses. Although Mr. Jacobs does not have any diagnosed mental health conditions, he has not had an opportunity to speak to any professional regarding these losses and how they may have impacted him. Certainly, his resulting drug usage impaired his thought processes and likely contributed to his poor decision making and actions here.

C. Mr. Jacobs's Age and Immaturity

Mr. Jacob's young age and immaturity at the time of this offense certainly played a role in his criminal conduct. This assertion find support in a report by the Sentencing Commission, which has acknowledged the growing recognition that age plays a significant role in criminal behavior. *See* U.S. SENT'G COMM'N, YOUTHFUL OFFENDERS IN THE FEDERAL SYSTEM (May 2015) at 5, *available at* https://www.ussc.gov/sites/default/files/pdf/research-and-publications/research-publications/2017/20170525_youthful-offenders.pdf. Importantly, the Sentencing Commission has found that people may not gain full reasoning skill and ability until they have reached the age of 25. *Id.* at 5. The prefrontal cortex of the brain, which is utilized in impulse control, emotional reactions, executive function, and decision-making, is the last part of the brain to develop. *Id.* at 6. In evaluating criminal conduct, the Sentencing Commission expanded their own definition of "youthful offender" to those as old as 25 when they face federal sentencing. *Id.* at 5. Mr. Jacobs was 19 when he became involved in the instant offense. As he acknowledges, although he was old enough to know right from wrong, he was still "a childish

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kid.” Letter from Anthony Jacobs, attached hereto as Exhibit D. His young age and lack of development certainly played a significant role in his impulsive and dangerous actions.

D. Mr. Jacob’s Early Acceptance of Responsibility

Mr. Jacobs pleaded guilty and accepted responsibility within six months of his arrest. He also pleaded guilty to an information, thus obviating the need for the government to present the case to a grand jury, and produce discovery. Further, by pleading guilty, he did not take up additional court resources by the filing of motions. Although he receives acceptance of responsibility points under U.S.S.G. §§ 3E1.1(a), (b), he would have received these points even if he had not waived indictment, waived discovery production, and filed motions. He respectfully requests that his early acceptance of responsibility and saving of judicial resources should be accounted for in his sentence.

E. Mr. Jacobs Has Faced Harsh Conditions While in Custody

As Mr. Jacobs acknowledges, his time in custody is the first time he has ever served time in a true prison setting with other adults and the experience has been eye-opening. Exhibit D. He does not wish to spend the rest of his life in this predicament. He has also served the vast majority of his sentence at the Metropolitan Detention Center in Brooklyn. PSR ¶ 6. This facility is severely understaffed, which results in inmates consistently being locked down in their cells for extended periods of time. Mr. Jacobs kept track of the days in which he spent locked down in his cell since arriving at MDC in March 2023. From the time he arrived until the filing of this letter, he has spent 245 days at MDC Brooklyn. He has been locked down for 137 of those 245 days—more than 50% of his time at the facility.¹

It has also made it more difficult for him to visit with his family. His family is located in Yonkers and visiting him in Brooklyn would have been difficult under the best of circumstances. However, with understaffing at the facility, his family, specifically his mother, has made this trek to Brooklyn only to be told after she arrived that her visit was rescheduled for the end of the day. As a result, she could not meet with him at all. His youngest son has never been able to visit him at this facility and Mr. Jacobs has never had the opportunity to hold him, which is particularly

¹ The lockdowns per month are as follows: March 2023—19 days; April 2023—20 days; May 2023—17 day; June 2023—20 days; July 2023—28 days; August 2023—19 days; September 2023—9 days; October 2023—3 days; November 2023, thus far—2 days.

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difficult as he was unable to be there for his son's birth. Video visits are also frequently cancelled because of understaffing at the facility. For a first exposure to a jail setting, this facility is certainly one of the harshest.

F. Mr. Jacob's Still Enjoys the Support of His Family


Despite these obstacles, Mr. Jacobs still enjoys the love and support of his family. Exhibits A-C; Letter from Keyanna Gist, dated October 23, 2023, attached hereto as Exhibit E. His mother has a place for him to return to once he is back in the community and is prepared to offer him support as he transitions back to life outside of custody. Exhibit A. Although she did not realize the extent of his actions prior to his arrest here, she appreciates now what he has gone through and wants to support him in any way to ensure he leads a law-abiding life in the future. Exhibit A. Further, his sister and aunts are also in a position to provide him with emotional support following his release and remain supportive of him despite his actions here. Exhibit B, C, D.

G. Mr. Jacob's Plans for Future

Further, he appears to have given real consideration to what he will do upon his release. Exhibit D. His history indicates that he is a smart and can succeed academically. He is interested in pursuing college courses and being a father to his two young sons. He has also given consideration to how he can lawfully support himself and his sons after completion of his sentence. He has also found healthier ways of coping with his grief and is committed to maintaining his sobriety upon release. Exhibit D. He recognizes his impetuous actions and appears to be committed to leading a law-abiding life in the future.

Based on the enclosed, Mr. Jacobs respectfully requests a downward variance. Thank you for your time and consideration.

Respectfully submitted,



Elizabeth K. Quinn
Assistant Federal Defender
Counsel for Anthony Jacobs

cc: Timothy Ly, A.U.S.A. (via email)

October 27, 2023

Honorable Vincent Briccetti
United States District Judge
Southern District of New York

My name is Kesha L Gist. I am the Biological Mother of Anthony Ke'Shaun Jacobs.

Anthony is the youngest of 4 children. He has 2 older sisters, Chalane and Aniya, from a previous relationship of his father Anthony. An older brother, Donovan, from a previous relationship of mine. His Dad and I made sure Anthony, and his siblings were around one another as much as they could be even though his 2 sisters resided elsewhere. He grew up having a close relationship with his oldest sister Chalane and his brother Donovan. Anthony was raised in a two-parent home with his brother until 2019 when Donovan passed from complications due to [REDACTED] Anthony's father passed in 2021 due to complications from [REDACTED] Before these tragic losses that may have later caused clouded judgement and poor decision making.

Anthony was a very smart toddler. He learned how to write his name at the age of 24 months. He learned to walk and talk early also. He loved to draw and read books from the age as early as 2 years old. While he was in Pre-K, his teacher noticed his love for reading and recommended sending books to school for him to read. He would finish his schoolwork before others, so she implemented extra time for reading while the other students worked to keep him occupied. He was an honor roll student in later grades and received many achievements in academics.

After moving from a two-bedroom apartment building when Anthony was 2 years old. We moved into a 3-family home with his Paternal Grandma living on the 3rd floor. We moved into the 2nd floor apartment. This living arrangement lasted for short time. Anthony was very close to his NaNa and he missed her when she left the house. We remained in the house for a total of 6 years. We moved to the 1st floor which gave the boys their own rooms. Anthony's Maternal Grandma, Aunt and 6 cousins moved in on the 2nd and 3rd floors. We were then and still are now a very close family. His 6 cousins are more like siblings than cousins to Anthony. His Aunt is a second mother a Godmother as matter of fact. He did many things an average boy from the ages of 2 - 9 years of age. He became interested in sports at the age of 4 he played T-ball for North Yonkers with his cousin. At age 5 he became interested in Basketball we signed him up at the YMCA of Yonkers. He learned the basic drill skills and techniques. At age 9 we moved to Trevor Park Terrace Anthony's Grandma and Pop-Pop resided there also until this day. He continued with Basketball and learned the sport well by playing at the Y and with his dad outside on the

EXHIBIT

A

courts at Trevor Park. His cousin would eventually join the Y and at 10 years old Anthony was now an elementary schooler playing Basketball with middle schoolers he was on the team with 12 /13-year-olds the team went on to win a State Championship. He continued with Basketball but now he played with the Nepperhan Community Center. He played on the team with his cousin during the summer months for 4/5 years. His teammates became friends some closer than others. He would attend Church on Sundays with 2 friends that were cousins and, on the team, also.

After a brief separation from his Dad I moved my boys to South Broadway in Yonkers. Anthony was upset of the separation, but his dad would check on him daily, take him out on the weekends. I made a nice home for us, but I soon learned the areas surrounding our home weren't all that great. Shortly after the move Anthony's dad and I reconciled, and he returned home. Then we noticed a change Anthony would get into trouble from time to time at school which would result in disciplinary measures home. He wasn't allowed to have friends over, no outside privileges, video games or phone privileges. We didn't know what was going on or what to do otherwise. His grades remained good and his teachers loved him. His science teacher told me once Anthony could run circles around one of his students in the 11th grade. At this time Anthony was only in 9th grade Mathematics he maintained a high-grade average. His English teacher adored him. His grades in all other subjects were good also. After a while grade declined and school wasn't an option. He would eventually end up taking the GED test he passed in 2021. He has the 10-hour OSHA Certification also.

Anthony became a dad [REDACTED] to [REDACTED]. As a young father he learned how to care for his son quickly. We helped him during the day and evenings after work and supported both Anthony and [REDACTED] financially. [REDACTED] lived with us until Anthony's Father passed. The loss of his dad and his brother two years prior was devastating, and it changed Anthony. I didn't see or know what was going on. I was dealing with the same losses and grief differently. I talked to him as much as I could, but I didn't see past my pain that it didn't help him with his pain or coping with both losses.

Anthony became a dad for the second time to another baby boy named [REDACTED] [REDACTED]. He missed the birth and the first 4+ months of his life. He hasn't seen him other than a glance in court, but he checks on him daily. [REDACTED] he's missing him so much. He has learned how to talk use the potty and much more since his dad's been missing from his life for 8 months now. He asks about his son's every time we talk whether by phone or email. [REDACTED] talks to him on the phone when Anthony calls on weekends. He is sad he's missing so much with his sons. He plans to enroll in classes/ trainings to prepare him for life after incarceration. He hopes gainful employment and remaining employed to support his two sons after release. He wants his children to know, love and grow up around one another. The same as he was raised with his siblings.

Anthony will reside with me, I'm currently living with Anthony's Grandma. My plan is to continue to support my son as much as I possibly can when he returns home.

Thanking you for your time Judge Briccetti.

Sincerely

A handwritten signature in black ink, appearing to read "Kesha L Gist". The signature is written in a cursive, flowing style with a large initial 'K' and a distinct 'G'.

Kesha L Gist

Dear Honorable Judge,

I'll start this letter by introducing myself. My name is Chalane Robins, I am the oldest of four siblings and Anthony Jacobs oldest sister. Although we were raised in different households, Anthony has always been our baby. We have different mothers but shared our father who recently passed away.

Growing up Anthony was the most charismatic, fearless kid you'd ever meet. He made everyone laugh and he always spoke his mind. He knew exactly what he wanted at a very young age. For the most part he wanted to be exactly like our father. Anthony loves his family; he admired his older brother and even though we are 13 years apart he always called and checked on me. He has a big heart. Like any boy he got into mischief as a kid and some growing into an adult, but he's not a bad person. I would say misguided. Out of all the siblings he was the closest to our father. For a large part of my childhood my father was in prison, but when he came home and had anything he tried to turn his life around. My father was no saint, and he had a colorful past, but he to loved his family. He was a provider and did whatever he had to do, take care of his children and he loved music. That probably explains why Anthony takes such an interest in it. He is so much like my father, both good and bad. Getting involved in the street life was just him following in our dads' footsteps. We know our children often do what they see rather than what they are told. Even though we were raised in good households and told to be respectful, do good in school stay out trouble, sometimes we do the opposite because we see our parents (who are not perfect) do the same.

My brother and I aren't as close as we should be, but he was very close to our brother Donovan. Sadly, he passed away, and that took a toll on Anthony. He lost his best friend and someone he truly admired. He never expressed how devastated he was because he didn't know how to. Shortly after losing our brother our father passed away as well. I never saw Anthony cry, he tried to stay strong for the rest of the family, but I could see the pain in his eyes. He was broken. I believe he is still grieving the loss of people that were so close to him. At a young age you don't know how to process those emotions, some people act out. We all handle things differently. At a time when it seemed like no one was there for him, the streets welcomed him with open arms, and he obliged.

I don't know what Anthony's charges are, but I do know he's no criminal nor is he a bad person. I know he is a young man who has made mistakes, just as we all have. I know he is a father to two boys who need him, one who he hasn't been able to meet in person yet. If nothing else my brother loves his children just as much as our father loved us. I know for sure he will turn his life around to be there for his kids and break the generational curse in our family of incarcerated fathers.

I hope this letter gives you a better idea about who Anthony is and hopefully you'll see him in a more positive light. At this time in his life, he really needs to be around family. I know he



regrets the decisions that led him here, but please give him a chance to turn things in a different direction. He is young with a lot more life to live and goals to accomplish.

Sincerely,

Chalane Robins

October 27, 2023

Dear Honorable Vincent Briccetti
United States District Judge
Southern District of New

My name is Denice Enders, I am the mother to Anthony, two little cousins. I am more like an aunt to Anthony. I have known Anthony since he was one years old. When I first met Anthony I was pregnant with my first daughter (his cousin). He was the cutest little loving baby boy. He always used to sit on my lap and talk to his cousin while she was in my belly. I used to visit him and his family almost every weekend. This is when we grew a bond. He always wanted to sit next to me and talk or if I took a walk to the store he used to ask to come. Anthony was always a happy little boy smiling, talking and playing whenever I saw him.

Based on my history with Anthony and knowing his upbringing, I know that this isn't normal for him. Being a witness to both deaths he experienced from close loved ones, his only brother and father I think this was geared more towards misdirected anger. Anthony endured a lot in such a short period of time. Becoming a young father and having to witness his father's death all in the same year with no coping mechanisms or a way to express his frustration is a lot for someone to deal with. Anthony always wanted to remain strong by saying he was okay because he knew it was just him and his mother left out of his four household family. He tried to be strong for his mother and she too was very stressed out having to bury both son and Anthony's dad. The last thing Anthony wanted to show was that he too was falling apart.

Anthony being incarcerated has put a lot of stress on his mother; she now steps in as much as possible and tries to provide for his son (her grandson). Also his son was a daddy's boy for the time that Anthony was home, his son stayed with him all the time. His son is what gave Anthony some sense of joy with all that he has bottles up. I can speak based on knowing this because I am very close to the family and also play a role in Anthony sons life.

Anthony has always been a bright, smart person. He used to love to play basketball as a young boy. Anthony was always a star student in school; it was a breeze for him in elementary school. He always got good grades and plenty of awards. I always thought Anthony would be in the fashion industry because he loved clothes. He knew how to give people ideas of what to wear and how to coordinate clothes.

I will always support Anthony on any positive decision he chooses to make in life that will keep



him on the right track as a person, son, father, and family member. I always tell him that I love him through messages to his mother. He knows that I will support him emotionally when he wants to talk. He knows that I will listen.

Sincerely,

A handwritten signature in black ink, reading "Denice Enders". The signature is written in a cursive, flowing style with a large, sweeping "D" and a long, horizontal stroke at the end.

Denice Enders

Dear Honorable Judge Vincent Briccetti:

First off I would like to properly introduce myself and also inform you as to why I'm writing you this letter. My name is Anthony Jacobs. I am now 20 years old and I am writing this letter to you for you to get a better understanding of who I am, to express my remorse for the crime I have committed and also to inform you that this will never happen again because my lesson is by far learned from my mistakes.

Your Honor I want to apologize to you and the courts for my acts involving the crime I have committed and also my kids and not because it sounds like the right thing to do but because I truly am sorry for my actions that took place and I truly do regret them.

I committed this act when I was 19 years old and even though I was old enough to determine right from wrong I was still a childish kid. This is my first experience in prison with nothing but adults and I want to make it my last time ever in this predicament. I now see this is not the place where I want to spend the rest of my life and committing crimes is not the way that I want to live the rest of my life. When I do receive the blessing of freedom again I now know this is the only result of breaking the law, using drugs and also not being around positive places and surroundings. I ended myself in a 5 minute situation that the younger, unhealthy and childish me would think is only "quick and easy" but in reality was only costing me months and precious time lost with my loved ones and kids that I can never get back and also time of my life just stuck in prison. I could have been home with my family preparing for my son's birth that approached while I was here in prison but I was influenced by being intoxicated on drugs and trying to live a flashy lifestyle.

I am now 100 percent healthy and sober now and I taught myself how to deal with the loss of my beloved father and brother by meditating, exercising, and reading I also learned plenty of ways to earn legal cash for example, llc's , trades and also cryptocurrency as opposed to taking drugs to cope with my problems and seeking for quick cash like I was when I committed this crime. I learned plenty of things from this experience away from home in prison that made me change to improve myself and my life for the better. I received a certificate for ged and enrolled into college classes these are things I will involve myself in when I go back home to create opportunities for me and my family for a better way of living life. I have multiple plans and goals for the future and now I understand the right and legal way to make it happen for myself, loved ones and family they are who keeps me motivated to achieve these goals and become the man I want to become in life. I know I will have to continue with my college classes when I am home to become a step closer to fulfilling my dreams and aspirations and these are now things I am willing to focus my time and energy on now.

Thank you Your Honor for this opportunity. I'm not just speaking to you to convince you for leniency. I want you to understand I truly regret the decisions I made committing this offense and I accept full responsibility for my actions I made a mistake, and I didn't make a hobby out of this. I see this is not a place where I'm physically or mentally able to spend the rest of my life but I understand I committed a crime and I must be sentenced to some type of time. I just ask that you forgive me and take into consideration that I'm not just another kid lost to the streets I have



found myself within this time I have spent in prison and I have goals and plans for me and my two sons in the future.

Thank you.

Sincerely,

Anthony Jacobs

10123123

My name is Keyanna Gist I am the aunt to Anthony Jacobs.

I come to you today to ask if you can take a few moments of your time and try to visualize the life of trauma, tragedy, puberty of a young black male.

Anthony the son, brother, cousin, nephew, grandson, human being. During his years as a child until now he experienced playing sports, winning state championships, achievements of high accolades within academics. Adolescent and young teenage years became challenging naturally, however becoming riddled with tragedy upon tragedies giving so much trauma to the brain. Typical behavior of a pre teen the know it all phase, first time trying a thing, friends, sexual curiosity, peer pressure, trying to understand yourself and these changes of transition, immature decision making some natural events to have experienced.

Unfortunately for Anthony during this time he too would experience a near death events death of his only brother, death of his father to covid, becoming a young father, losing many family members in a short span of time between events.

Although in Anthony latter teenage years he

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would make life changing decisions leading him here before you today. However his decisions made at that moment do not define who Anthony is today.

I ask for leniency and collaboration with his family support system for guidance through training and therapy for the development of healthy decision making

Best regards

Keyanna Gist