

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO. 17-10023-IT
)
 TAKARI ELLIOTT)

DEFENDANT’S SENTENCING MEMORANDUM

The defendant joins in the sentencing recommendations outlined in the plea agreement and in the Government’s Sentencing Memorandum [D.E. 27]. As the government notes, Elliott has evidenced a desire to change the trajectory of his life by pleading promptly and agreeing to conditions of supervised release designed to assist him in making a complete break from his dysfunctional upbringing and the dangerous choices he has made.

In a different case with a different set of circumstances, undersigned counsel might well challenge the government’s suggestion that geographical exclusions and associational restrictions are “commonsensical” responses to the risk of recidivism that lend themselves to effective and straightforward implementation. Government Sentencing Memorandum at 6. As a practical matter, such restrictions and exclusions often have the effect of banishment and forced separation from the only support system available to a young offender, a fool’s errand that leaves him or her with few or no resources with which to rebuild a trouble-free life.

But in this case, the narrowly tailored geographical exclusion zone and the specific associational prohibitions promote Elliott’s already demonstrated desire to put his past behind him, and to physically and mentally remove himself from the milieu that has culminated in dangerous chaos. It is testimony to Elliott’s resolve that he has agreed to join in the exclusion and prohibition conditions proffered by the government.

In addition to the jointly recommended conditions of supervised release, defendant requests a judicial recommendation to one of the two Bureau of Prisons facilities located in New Jersey. While the Presentence Report (“PSR”) correctly lists Elliott’s residence address in Massachusetts (and he may well initially return here when released), the PSR also notes immediate family members who reside elsewhere in the mid-Atlantic and Northeast region. Service of the sentence at a facility in New Jersey will facilitate visits from positive elements of his family and thus promote his efforts to break from the course his life has taken thus far.

CONCLUSION

For the reasons above and those outlined by the government in its memorandum, defendant submits that the Court should impose the jointly recommended sentence of thirty (30) months’ imprisonment with three years of supervised release to follow. The Court should not impose a fine.

TAKARI ELLIOT
By His Attorney,

/s/ Timothy Watkins
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CERTIFICATE OF SERVICE

I, Timothy G. Watkins, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), as well as U.S. Probation Officer Marlenny Ramdehal by electronic mail, on May 9, 2017.

/s/ Timothy G. Watkins
Timothy G. Watkins