

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

UNITED STATES OF AMERICA : **CRIMINAL NO.: 3:08-cr-00110-JBA**
VS. : **JUDGE JANET BOND ARTERTON**
CYNTHIA McCLENDON : **SEPTEMBER 9, 2008**

MEMORANDUM IN AID OF SENTENCING

Introduction

The following discussion of points and authorities and attached exhibits are submitted on behalf of Cynthia McClendon to aid this Court in fashioning a sentence that is “sufficient, but not greater than necessary” to reflect the seriousness of the offense, promote respect for the law, provide just punishment and afford adequate deterrence, satisfy the need for the sentence to avoid unwarranted disparities and to provide restitution as set forth in 18 U.S.C. 3553(a)(2).

It is respectfully submitted that because of the presence of several mitigating factors and circumstances which are part of Mrs. McClendon’s characteristics and background, and because the defendant is extremely remorseful and has suffered greatly as a result of the publicity and consequences which emanated from her arrest, and because, other than this offense, Mrs. McClendon has led a law abiding life and has overcome many obstacles in her life, it is submitted that a sentence of probation would be “sufficient, but not greater than necessary” to satisfy the purposes of

3553(a)(2).

The defendant acknowledges that her actions were wrong and that her offense constituted an affront to the integrity of the judicial system. It is submitted, however, that her actions were the result of her kindness and susceptibility to being manipulated, more than they were the result of any avarice or greed on her part. Letters from several co-employees and acquaintances, which are attached to this memorandum, carry a general theme that Mrs. McClendon was kind to a fault and that she was, to an extent, seduced by the collegial atmosphere which permeated the New Haven Courthouse and which will be discussed in more detail later on in this memorandum.

The defendant has been subject to public humiliation since the report of her arrest. Because of the popularity of the Jacobs' and because of the sensationalism of the reporting of the wrongdoing of Officer Billy White and the bondsmen, Mrs. McClendon became a part of that story and there were a myriad of articles which set forth in detail her arrest and the facts and circumstances of her transgressions.

In addition, the defendant was forced to resign from her twenty year position in the New Haven Public Defenders Office (see Letter of Resignation attached). This was a job that she loved and it is submitted that the loss of her employment and that public humiliation she has suffered from this incident are sufficient punishment. A sentence of probation, with a short period of house arrest,

if the Court feels such is necessary and community service would be a penalty which would be satisfactory in this case. The defendant prays that this Court will sentence her in that manner.

History of the Case

This case commenced when the government became aware that Robert Jacobs and his sons were providing cash to Officer William White of the New Haven Police Department in exchange for assistance in locating bail absconders. The government's investigation ultimately revealed that White and other law enforcement officers were engaged in a scheme with Robert Jacobs, Paul Jacobs and Philip Jacobs. Robert and Philip Jacobs were bail bondsmen associated with Jacobs Bail Bonds in New Haven, Connecticut and Paul Jacobs was a bail bondsman associated with Paul Jacobs Bail Bonds, also in New Haven.

On March 13, 2007, White and the three Jacobs were arrested. On April 25, 2007, a Federal Grand Jury returned an indictment against White, Robert Jacobs, Paul Jacobs and Philip Jacobs charging them with Bribery Conspiracy in violation of 18 U.S.C. §371, Bribery in violation of 18 U.S.C. §666, and Theft of Honest Services Mail Fraud in violation of 18 U.S.C. §1341/136. In a separate indictment, White was also charged with Theft of Government Property in violation of 18 U.S.C. §641.

On October 31, 2007, Robert Jacobs, Paul Jacobs, and Philip Jacobs each pleaded guilty to

one count of Bribery Conspiracy.

As part of their guilty pleas, Robert Jacobs, Paul Jacobs and Philip Jacobs entered into cooperation agreements with the government. As part of his cooperation, Philip Jacobs admitted that starting in approximately 1994, he made cash payments to the State of Connecticut Judicial Marshals, State of Connecticut Court Personnel in New Haven and an Administrative Assistant in the State of Connecticut New Haven Public Defenders Office. Arrests of a Judicial Marshal and an Administrative Assistant in the New Haven Public Defenders Office (Mrs. McClendon) followed from Philip Jacobs' cooperation. No State of Connecticut Court Personnel in New Haven were arrested. The arrest of Cynthia McClendon resulted from a recorded telephone call to her asking for the address of a fugitive. After she provided him with the address, he asked to meet her outside the courthouse and gave her \$50.00. That event occurred on May 22, 2007.

On July 30, 2007, Philip Jacobs again telephoned Cynthia McClendon and requested that she provide him with an original file of a client. During that telephone call, Jacobs told Mrs. McClendon "I am in a real bind. I need to get a file. I will have to pay a \$75,000.00 forfeiture if I don't get the file. It is worth a lot to me if I can get this file." Mrs. McClendon provided the file to Mr. Jacobs and he gave her \$500.00. At that time, Mrs. McClendon told Philip Jacobs that what he did for her was a blessing and that she had bought clothes for her parents with the money. The defendant was

subsequently arrested and on June 2, 2008, before this Honorable Court, waived indictment and entered a guilty plea to a one count information which charged Soliciting and Accepting a Gratuity in violation of 18 U.S.C. §666(a)(1)(B).

On that date, a plea agreement was filed and signed by both parties. In the plea agreement, the government agreed to recommend that the Court reduce by two levels the defendant's adjusted offense level under 3E1.1(a) of the Sentencing Guidelines, based on the defendant's prompt recognition and affirmative acceptance of personal responsibility for the offense as well as the defendant's timely notification of her intention to enter a plea of guilty.

The government and the defendant stipulated that the defendant's applicable guidelines constituted a range of four to ten months imprisonment and a fine range of \$1,000.00 to \$10,000.00.

The base offense level under 2C1.2 is 11. After subtracting two levels under 3E1.1 for acceptance of responsibility, a total offense level of 9 resulted, which combined with a Criminal History Category I, resulted in the sentencing range of four to ten months and the consequent fine.

Post Booker Sentencing Analysis

In an important series of cases that began in 1999, the United States Supreme Court examined the roots of the right to jury trial in both the original Constitution and the Bill of Rights. This analysis culminated in the first instance in the decision of United States v. Booker, 543 U.S.

220 (2005). Post-Booker, the courts adopted a sentencing procedure which was clarified in the Second Circuit in its decision in United States v. Crosby, 397 F. 3d 103 (2nd Cir. 2005).

Under Booker and Crosby, the factors set forth in 18 U.S.C. §3553(a), including the Sentencing Guidelines, should each be considered by the Court. No one factor within 3553(a) is elevated to presumptively controlling weight. The guidelines are more than “a body of casual advice, to be consulted or overlooked at the whim of the sentencing judge”. Crosby 397 at 113, 114. However, they are not the controlling factor, more important than all - or any - of the other factors listed in 3553(a). After considering the Guidelines, the sentencing judge may impose either a Guideline sentence, including one taking into account the departures or a non-Guideline sentence. Id. at 113. Section 3553(a) requires a court to impose a sentence “*sufficient, but not greater than necessary*”, to promote the purposes of fair sentencing. Under Booker, “[s]ection 3553(a) remains in effect, and sets forth the numerous factors that guide sentencing”. Booker, 125 S. Ct. at 766.

Those factors include:

1. The nature and circumstances of the offense and the history and characteristics of the defendant.
2. The need for the sentencing 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;
 - (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 §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 §994(p) of Title 28); and
 - ii. That except as provided in §3742g 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 §994(a)3 of Title 28, United States Code, taking into account any amendments made to such Guidelines or policy statements by act of Congress (regardless of whether such amendments have yet to be incorporated by the Sentencing Commission into amendments issued under §994(p) of Title 28);
5. Any pertinent policy statement - -

- (A) Issued by the Sentencing Commission pursuant to §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 §994(p) of Title 28; and
 - (B) That, except as provided in §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.

The Court in Crosby declined to define how a district judge is to “consider” the Guidelines.¹ Nothing in either Crosby or Booker suggests that a guideline range, once it is found, is to be presumptively considered “reasonable” or, in essence, a default position. Although the court cautioned that judges should continue to “reduce unwarranted disparities”, they should now be able to achieve “more individualized justice”. Crosby, 397 F. 3d at 113, 114. “In short, there need be no ‘fear of judging’”. Id.

Recently, in Rita v. United States, 127 S. Ct. 2456 (2007), Kimbrough v. United States, 128

¹ Some district courts have adopted this definition: “The term ‘consider’ requires the sentencing judge to be “aware of both the statutory requirements and the sentencing range or ranges that are arguably applicable,” and be sure that “nothing in the record indicates misunderstanding about such materials or misperception about their relevance.” United States v. Mann, 2005 U.S. Dist. LEXIS 2150, at *13 (S.D.N.Y. Feb. 14, 2005) (Baer, J.).

S. Ct. 558 (2007) and Gall v. United States, 128 S. Ct. 586 (2007), the court gave substantive and procedural content to the remedy making clear that §3553(a) is the controlling sentencing law and rejected the devices that were used after Booker to maintain a de facto mandatory guideline sentence. In Gall and Kimbrough, the court echoed the statutes and recognized that a “deferential abuse-of-discretion standard could successfully balance the need to reduce unjustifiable disparities across the Nation and consider every convicted person as an individual”. Gall at 598 n.8. The court held that simply by “correctly calculating and reviewing the guideline range,” judges “necessarily give significant weight and consideration to the need to avoid unwarranted disparities.” Gall, 128 S. Ct. at 599. The court recognized that unwarranted uniformity is as every bit as objectionable as unwarranted disparity; “[I]t is perfectly clear that the District Judge ... also considered the need to avoid unwarranted similarities among other co-conspirators who were not similarly situated.” Id. at 600. In Gall, the court held that the sentencing judge “should begin all sentencing proceedings by correctly calculating the applicable guideline range”. Id. at 596. Gall also held that as a “matter of administration and to secure nationwide consistency,” the guideline range “should be the starting point and the initial benchmark.” Id. This is procedurally correct since the guideline range is the only §3553(a) factor expressed as a number of months.

The Gall court further held that because the guidelines are not the only consideration, the

judge, “after giving both parties an opportunity to argue for whatever sentence they deem appropriate,” “should then consider all the §3553(a) factors to determine whether they support the sentence requested by a party.” Id. The judge must independently evaluate the appropriate sentence in light of the §3553(a) purposes and factors, and must consider arguments that the guidelines should not apply on general policy grounds, case-specific grounds or “regardless”. Rita, 127 S. Ct. at 2463, 2465, 2467-68. In doing so, the judge “may not presume that the guideline range is reasonable.” Gall 128 S. Ct. at 596-97. The judge “must make an individualized assessment based on the facts presented.” Gall 128 S. Ct. at 597.

These recent decisions clarified the Supreme Court’s position regarding sentencing and the purposes of the guidelines. These decisions make it crystal clear that the 3553(a) factors are paramount to any sentencing determination and also that the *parsimony clause* is an “overarching” provision instructing the district courts to “impose a sentence sufficient, but not greater than necessary to achieve the goals of sentencing”. Kimbrough at 570.²

Parsimony Clause

The defendant requests that this Court consider the implications of the *parsimony clause* in

² The Second Circuit, in 2006, spoke for the first time regarding the parsimony principle upholding its validity and viability in the matter of United States v. Ministro-Tapia, 470 F. 3d 137 (2d Cir. 2006).

determining an appropriate sentence in this case.

It is unquestionably true that, under the mandatory guidelines, some required sentences are much too harsh and draconian in nature. Prior to the mandate in Booker and its progeny, courts had very little opportunity to depart from the guidelines since certain relevant factors were excluded as departure considerations.

Post-Booker, courts can now issue a non-guideline sentence in such situations which the defendant is asking the Court to do in this case. Before discussing the facts and circumstances of this case and the defendant's request for parsimony, a short historical analysis of the *parsimony clause* will help put this all into perspective.

The one congressional command in 18 U.S.C. §3553(a) is that district courts must "impose a sentence sufficient, but not greater than necessary", to comply with the specified purposes of punishment. This statutory language is an eloquent distillation of one of the most long-established and influential maxims in criminology: The Principle of Parsimony. That principle, which provides that punishment should *never* exceed the minimum necessary to effect its purposes, has deep roots in American soil. It is well known to the founding generation through the work of the Italian criminologist Cesare Beccaria, who borrowed the concept from Montesquieu, as well as the English philosopher Jeremy Bentham. The maxim was given new vitality in the twentieth century and was

one of the foundational ideals for a number of reform-minded criminal law scholars whose efforts culminated in the Sentencing Reform Act of 1984.

The principle of parsimony has now taken on new significance in light of Booker, Gall, Rita and Kimbrough. By excising a conflicting command in 18 U.S.C. §3553(b)(1), that district courts must follow the sentencing guidelines, the remedial majority in Booker left the principle of parsimony as the sole binding substantive feature of the statutory sentencing scheme. Federal courts must follow that congressional command at every step of the sentencing process just as seriously as they were required to follow the guidelines before Booker. In fact, now that the Supreme Court has determined that the *parsimony clause* is the “overarching” principle of sentencing, it has taken on even greater significance.

Sentencing Analysis

Nature and Circumstances of the Offense as per §3553(a)(1)

The defendant acknowledges that her actions constituted a violation of the law and she understands that her actions also constituted a violation of the integrity of the judicial system. She understands that the public’s perception of the integrity of that system is important to insure that the public maintains respect for the law.

With that in mind, it is believed by the undersigned and by those who have written letters on

Mrs. McClendon's behalf that it was her simple nature and overwhelming trust and kindness that led to her transgressions in this matter. She had been employed by the Public Defenders Office for approximately twenty years.

At the time that she first commenced working in that job, Robert Jacobs was a fixture in the New Haven County Courthouse. He wrote most of the bail bonds in New Haven and was extremely aggressive in going after all of the business. In addition, he was a charming individual who was friendly with the lawyers and court personnel. In fact, when Mrs. McClendon commenced working in the Public Defenders Office, Robert Jacobs and ultimately his sons, had an actual desk in the Public Defenders Office and hung their coats on a coat rack in that office. They routinely conducted business in the hallway outside the Public Defenders Office and, in 2004, as a result of the annoying nature of their business and the public's perception of them counting money in close proximity to the Public Defenders Office, they were banned from the office and no longer had a desk or access.

Routinely, during that period of time, the Jacobs also bought lunch for office personnel, cashed checks for office personnel and lent money to office personnel. It is reported that they did that for many employees of the Courthouse.

Robert Jacobs and his sons knew Cynthia McClendon well. They knew of the fact that she had had an extremely difficult marriage, was raising her daughter on her own, was able, after a long

period of time to finally obtain some child support from her violent ex-husband and that she was basically the sole emotional and financial support of her parents when they became ill. They also knew that throughout this period of time, Mrs. McClendon had financial problems and struggled to keep her family afloat.

It is true, and the defendant acknowledges, that during a 10 year period prior to 2004, she received approximately \$1,500.00 from Philip Jacobs. This was not a quid pro quo situation in which she would give them a file and immediately receive monies in exchange, but rather a silent acknowledgment that because of the fact that they had cashed her checks, lent her money, paid for lunches and generally watched out for her, and she considered them her friends, she would help them. Although Mrs. McClendon received training in the Public Defenders Office regarding her job and the judicial system, it is not clear that she fully understood the ramifications of the attorney/client privilege especially since the only information that she was giving out was location information for absconders. It is true that she sometimes did let the Jacobs actually have the physical file, but it is believed that they were not interested in typical attorney/client strategy and things of that nature, but rather only how they could catch someone who had absconded.³

³ It is believed that the reason why these bondsmen needed intake information and wished to look at the files was because they were so frenzied in attempting to obtain the bond business from every defendant who came through that Courthouse, and would go out at any hour of the night to bond someone out, they, on many occasions, did not take proper intake information. Normally, a bondsman would take information regarding all the possible contact numbers of the defendant and any family members as well as enough of a history so that, if the defendant absconded, the bondsman would know where to look. As a result, when a defendant absconded, these bondsmen, lacking the necessary information as a result of their own avarice, would attempt to gather information from the public defender files since most of their clients were public defender clients. Although the files they obtained contained attorneys' notes and other attorney/client privileged information of a strategic nature, the bondsmen were not interested in that information, but only in contact information.

This is not set forth in order to minimize Mrs. McClendon's transgression since she acknowledges violations of the attorney/client privileges are serious, but only sets forth the details so that this Court may view her actions in the proper perspective.

When Philip Jacobs contacted Mrs. McClendon after his arrest and during his period of cooperation with the government, he, at first, simply called her to get an address which she gave him via telephone. He then asked her to come outside the Courthouse so that he could give her something and provided her with \$50.00. There was no discussion or any exchange of monies prior to her providing him with that information.

With regard to the \$500.00 transaction, Mr. Jacobs stressed that he would be in deep trouble if he did not get the file. Mrs. McClendon, being the kind and trusting person that she was, gave him the file. There was no discussion of \$500.00 or any gratuity prior to her giving him the file, but she acknowledges that she accepted the \$500.00 and used it to buy her parents clothes since this was an extremely stressful time in their lives.

The sequence of events in this case point up the trusting and naive nature of Mrs. McClendon's personality. It was well-known at the time of these events that Philip Jacobs had been arrested and was moving through the federal system. Most persons would have realized that two phone calls of the nature that she received after Mr. Jacobs' arrest probably was because of

cooperation, however, Mrs. McClendon was moved by the request of a friend and she acted mostly because of that consideration.

History and Characteristics of the Defendant as per §3553(a)(2)

Cynthia Ann McClendon was born on June 16, 1957 in New Haven, Connecticut. She had five younger siblings.

The defendant's father is age 75 and resides on Bristol Street in New Haven, Connecticut. He worked for 30 years at the Nutmeg Steel Company in Branford, Connecticut and presently suffers from throat and prostate cancer. He is undergoing radiation at the present time and the defendant transports him to his treatment.

The defendant's mother, age 72 resides in a convalescent hospital and is suffering from dementia, bipolar disorder, schizophrenia and diabetes. She was formerly an employee of American Linen Company in New Haven.

The defendant was raised in the housing projects of New Haven and remained home until age 21. Her father was an extremely stern man who was a strict disciplinarian and would discipline the children if they got out of line. The defendant describes her mother as a sweet woman who took care of her family and her mother served her father and the rest of the family members in a diligent manner despite the fact that she had a mental illness. The defendant is now the primary care giver

for her elderly parents as her siblings do not seem to want to participate at all in the care of their parents and, as a result, Mrs. McClendon has had to provide most of the transportation and other care necessary to maintain them.

Mrs. McClendon's eldest sibling, Robert Hayward, died at the age of 28 from a drug overdose. Her sister Celestine Hayward lives in Hamden, Connecticut and has a daughter. Her brother Johnny Hayward lives in Hamden, Connecticut with his child. He is employed by the State of Connecticut. Her brother Danny Hayward resides in New Haven, Connecticut and has three daughters. He is employed as a construction foreman. Her brother Ricky Hayward, 42, is currently an inmate at McDougall-Walker Correctional Institution serving a 4½ year sentence on a charge of Assault II.

The defendant has had a difficult life. She married Austin Nixon on June 24, 1978 in New Haven. She was attracted to Mr. Nixon because she thought he was the solution to her problem of living in a house where her actions were restricted and her father was a strict disciplinarian. It did not take her long to realize that she had made the wrong decision because Austin Nixon was violent and an excessive drinker.

The parties lived together from 1978 to 1985 at which time Mrs. Nixon was employed by the Department of Administrative Services of the State of Connecticut. During those seven years, Mr.

Nixon drank excessively and became violent when he was intoxicated. Mrs. McClendon was the victim of his attacks on several occasions and remained with him until one evening when her husband returned home after a night of drinking and demanded that she have sex with him. When Mrs. McClendon refused, her husband began to beat her. He picked up her daughter in his arms and, while she fled the apartment to seek help, he fired a 32 caliber handgun at her. The defendant states that to this day, she can still feel the bullet pass by her ear.

The defendant recalls that her husband was an employee of DCF at that time and was subsequently arrested and charged with Assault in the 2nd Degree. She believes that her husband received a sentence of probation. On that night, the defendant and her daughter left the house, she left her job in Hartford and moved to New Haven. When she arrived in New Haven, she began to live with her female cousin on Blake Street in New Haven. Within two months of her moving in, her cousin's husband killed a woman. The defendant recalls that she observed her cousin's husband doing a load of laundry in the early morning hours and went to use the bathroom and found tissue paper with blood on it. She stated that her cousin's husband was arrested the following day and investigators were searching the home looking for evidence.

The defendant reported she was subsequently called as a witness to testify about what she had seen and that a conviction was ultimately obtained. These facts are verified by Michael

Dearington who recalled the facts of the case and did not doubt that the defendant was actually called as a witness.

The defendant then married Marvin McClendon on January 17, 2007. Mr. McClendon is employed in the construction field. Mrs. McClendon has known her husband since they were children and they became reacquainted after she moved to New Haven and subsequently married. She reports she is happy in this relationship.

The defendant has submitted several letters from co-employees and acquaintances. These letters all point out what might be considered her motivation for her actions in this case, namely her desire to help others and her overall kindness.

Karen Dixon writes that:

“I knew Cynthia to be a very compassionate person. I can recall early in my internship (in the Public Defenders Office) and while I was in the process of moving, Cynthia was kind enough to offer her home to me during the two weeks that my apartment was not available. At the time, although it was generous offer, I was surprised as she had only known me for 2 months. I never knew anyone to be so trusting in such a short time.”

Amalia Horton and Tonya Grace, a Public Defender Secretary and a Public Defender Clerk, respectively, jointly write:

“Our experiences working side by side with Cynthia were always

positive. Cynthia has wonderful people skills. She was always willing to go beyond her duties to help our clients and to look out for their best interests. It is this exact good nature and trust in people that led to her current situation. Bobby and Phil Jacobs were able to take advantage of Cynthia's innocent disposition. While everyone in the courthouse believed that Bobby and Phil were corrupt, she refused to give into the courthouse gossip because she had known them for at least 20 years and felt they deserved the benefit of doubt. She truly believed that she was helping them at a time when others had abandoned them."

Geralyn Singh writes:

"Cynthia has always been willing to do what ever was needed to be done to the best of her abilities in order to take care of our clients. She treated each and every client with respect, compassion, and dignity. She was a pleasure and inspiration to work with and I consider it a privilege to have been able to work with her."

Susan P. Chetwin, an Assistant Public Defender writes:

"When I heard about the incident in which she was allegedly involved, I said to the three people that I was with that I didn't believe she had the capacity to knowingly scheme to obtain money illegally. If she is guilty of anything, it is that she trusted people more than she should have and was unable to protect her own interests because of dealing with the wrong people."

Her co-employee Heidi Boettger has also written a letter on her behalf. She states:

"As far as I am concerned, her sentence began on December 8th, 2007, at which time the federal government agents picked her up at home and had taken her to the federal lock-up in New Haven. Even though her sentencing date is scheduled for September 3rd, 2008, that is not the end of her sentence. She had already been sentenced to the loss

of her job, loss of her medical benefits, and a federal conviction on her record which will stifle her aim to secure other employment. End result? A 51 year old female, with pre-existing medical conditions, with elderly parents, having to wait four more years to be able to receive her pension benefits and medical benefits.”

Laurel Adams, Senior Assistant Public Defender has also written a letter on Cynthia’s behalf.

She writes:

“Throughout all of these variegations, Cynthia was calm, professional, helpful, generous and honest. I cannot deduce the circumstances that have led to her current situation, but I can reiterate that I am proud to know her and consider her friend.”

“I ask the Court to consider Cynthia’s many years of competent, generous and often “over the top” help to our client population; her stellar role in presenting to society her college-educated, estimable daughter; her selfless role as caretaker to two elderly and sick parents; and the total anomaly this case represents in Cynthia’s entire life experience as a law-abiding, single, working black mother living in inner-city New Haven.”

Joan A. Leonard, Supervisory Assistant Public Defender writes:

“This generosity of spirit has also meant that she often was taken advantage of by friends and family members. Though other relatives had greater resources and fewer obligations, it was Cynthia who took the responsibility for housing and caring for her elderly and ailing parents. She raised her personable and accomplished daughter to adulthood with minimal help from her ex-husband. It took numerous court orders to bring about even the smallest payment. Nonetheless Cynthia soldiered on struggling with college tuition, rent and food

bills.”

“As she was vulnerable to exploitation by family and friends, she was also an easy target of the convicted bondsmen in her current situation. It is sadly ironic that these men will profit from the solicited misdeed of the very person they corrupted. It turns the concept of justice on its head.”

Bevin Salmon, an Assistant Public Defender writes:

“Ms. Hayward was not only a good secretary but she also impressed me as a good and decent human being. She was professional, courteous, and amiable in her interactions with staff, courthouse personnel, and the clients that we represented.”

Janet Perrotti writes:

“I watched Cynthia take courses to try to improve her skills and I watched her struggle with raising her daughter as a a single parent who was traumatized by a difficult and abusive first marriage.”

“My most recent memories of Cynthia are caring for her elderly parents and worrying about the welfare of her second husband.”

“I ask the court to show Cynthia the same compassion that she always demonstrated toward our clients. This incident does not define the character of Cynthia. I write this letter with the same respect, affection and admiration that I have always had for Cynthia.”

James M. Chase, Senior Assistant Public Defender writes:

“Above all, Cynthia is a good hearted and compassionate woman. I hope that others will find it in their hearts to treat her with similar

compassion.”

The above letters have been set forth here in detail to highlight the fact that they present a common theme which is that Mrs. McClendon is a rather naive, trusting and caring person. Court personnel in the Public Defenders Office believe that she was manipulated by the bondsmen and that she did not have the capacity to turn them down because she considered them her friends. Cynthia has learned from this experience. The humiliation that she has suffered was a tragic lesson, but one that she will not forget.

The Kinds of Sentences Available per §3553(a)(3)

The maximum term of imprisonment is 10 years under 18 U.S.C. §666. The guideline imprisonment range is four to ten months. Because the instant offense is a Class C Felony, the defendant is eligible for probation. The authorized term is one to five years; 18 U.S.C. §3561(c)(1).

The Guideline Analysis per §3553(a)(4)

As indicated previously, the government and the defendant agree that the sentencing guideline range would be four to ten months and that the base offense level under the Guidelines after all adjustments would be 9 with Criminal History Category of I.

It is the defendant’s contention that this Court should impose a sentence of probation based upon an analysis of the 3553(a) factors and the *parsimony clause*.

Pertinent Policy Statements per §3553(a)(5)

There are no significant policy statements that the defendant wishes to point out to this Court.

The Need to Avoid Unwarranted Sentence Disparities Among Defendants with Similar Records who have been Found Guilty of Similar Conduct per §3553(a)(6)

This factor would seem difficult to apply in the abstract and separate from the other factors. If this Court faithfully applies the 3553(a) factors, then, by definition, sentence disparity has been reduced.

Restitution per §3553(a)(7)

The defendant has agreed in the plea agreement that she should be subject to restitution in the amount of \$550.00.

Satisfaction of the Needs of Sentencing

The following analysis is made with the *parsimony clause* in mind. It is the defendant's contention that a sentence of probation is appropriate. The defendant asks this Court to sentence her to a period of probation with a short period of house arrest, if the Court feels such is appropriate. The defendant is presently employed, having obtained part-time employment in the law offices of Walter Bansley. She will assume full-time employment with that office shortly.

To Reflect the Seriousness of the Offense, Promote Respect for the Law, Provide Just Punishment under §3553(a)(2)(A)

The defendant contends that a sentence of probation with a short period of home confinement if necessary would certainly reflect the seriousness of the offense considering the fact that the defendant has exhibited extreme remorse and has been subjected to public humiliation and the loss of a job which she loved.

In addition, in Gall, the court disapproved of the Eighth Circuit's characterization of Gall's probationary sentence as a 100% downward variance in part because the Supreme Court felt that the Eighth Circuit had given no weight to the substantial reduction of liberty involved in even standard conditions of probation. Gall at 595-96 & n. 4. Further the court in Gall indicated that ("A sentence of imprisonment may work to promote not respect, but derision, of the law if the law is viewed merely a means to dispense harsh punishment without taking into account the real conduct and circumstances involved in sentencing.") Id. at 599. (Quoting District Court Opinion).

To Afford Adequate Deterrence to Criminal Conduct under §3553(a)(2)(B)

Consideration of general deterrence, required under this section, mandates that the Court consider the extent to which similarly situated potential offenders will be deterred from committing similar crimes by whatever sentence the Court imposes in this particular case. This is, however, a

highly unpredictable exercise. It assumes that a person in the defendant's position considering whether to commit a crime weighs the consequences of getting caught and further weighs the benefits against the incremental risks of prison sentences of particular terms. However, most persons would not commit the crime at all if they thought they would be caught, regardless of the punishment. Further, it is impossible to conclude that somewhere along the range of "just" punishment there is a tipping point, a point beyond which a rational potential offender will conclude not to become involved in that offense due to the sentence for this offense. In any event, the Court can readily conclude that any reasonable sentence imposed will not serve materially different purposes as it relates to general deterrence. It is therefore, without question, that the punishment of this defendant by a sentence of probation with a short period of home confinement, if necessary, would be a severe sentence for this defendant since she has already suffered the loss of her job, a job that she had for twenty years and which she loved, and the public humiliation of having her case reported over and over in the local newspapers causing her great embarrassment and public shame. She was embarrassed for her daughter, her parents and her friends.

To Protect the Public from Further Crimes of the Defendant under §3553(a)(2)(C)

There is no question but that the defendant has already begun to assume a normal lifestyle. She has obtained employment in a law office and will be dealing with the public again. The

defendant has learned a great deal from this incident. She is 51 years of age with no previous criminal history and her chances of recidivism are extremely slim.

To Provide the Defendant with Needed Educational and Vocational Training, Medical Care and Other Correctional Treatment in the Most Effective Manner under §3553(a)(2)(D)

This factor is not applicable to this case.

Conclusion

The defendant has had a very difficult life. Not only did she make an early decision to marry a violent and abusive husband, but his violence caused her to leave a job of seven years with the State of Connecticut and come to New Haven where, luckily, she managed to obtain employment with the Public Defenders Office for a period of twenty years.

Mrs. McClendon is a very trusting and simple person. She had to undergo literacy training in her early days in the Public Defenders Office since she was able to deal with simple tasks, but complicated tasks became a challenge for her. She has improved herself over the years to the point where she was beloved in the Public Defenders Office.

An unfortunate set of circumstances led to her transgressions in this case. The climate in the Courthouse was one of a struggle to obtain all of the bond business and the Jacobs were good at doing what they had to do to get most of that business. Although Mrs. McClendon acted incorrectly,

she was, to a certain degree, also a victim of her good nature. She was played like a violin.

Susan Storey, the Chief Public Defender in the State of Connecticut has written a letter to the Court which we believe puts everything in perspective. Ms. Storey writes:

“Notwithstanding the facts of this case, the Office of Chief Public Defender respectfully requests that she not be incarcerated for her transgression. Ms. Hayward was a valuable employee of the Division for many years. While we are truly disappointed in her behavior which violated the trust of colleagues and clients, there were also many instances where Ms. Hayward performed above and beyond her required responsibilities to assist clients.”

“Furthermore, Ms. Hayward has resigned from her position as an employee of the Division. The loss of her employment and the trust of her colleagues will certainly cause her financial and emotional hardship and may be sufficient punishment in itself.”

In addition, the Pre-Sentence Report in Paragraph 57 (the Probation Officer’s evaluation paragraph) states:

“Releasing protected file information in exchange for a gratuity is wrong and certainly helps to erode the public’s trust in the criminal justice system. The defendant’s motive may have been to help a friend, which may help explain why she committed the offense. Unfortunately for her, it does not excuse it. Regardless of the sentence imposed in this case, the damage to the defendant has already been done. She has suffered a considerable collateral cost by her involvement in the instant offense, both by losing the job she loved and having undergone the shame of a very public prosecution. The defendant was four years from retirement eligibility. Based on

her lengthy history of regular, full-time employment, as well as the fact that she is a first time offender, her risk of recidivism appears to be very low and a non-custodial sentence appears to be sufficient punishment for the offense.”

The defendant respectfully asks this Court to sentence her to a period of probation with a short period of house arrest, if the Court feels that is necessary. The defendant has learned a great deal from this experience and that is that she cannot be blindly trusting of those people she considers her friends. That trust and friendship and weakness in the face of financial difficulties have caused her public humiliation along with the loss of her job. It is expected, based upon discussions with the U.S. Attorneys Office, that they will not request incarceration at sentencing.

The defendant respectfully requests the Court to sentence her to probation. She will not be before this Court or any other Court again as she has learned greatly from this experience.

RESPECTFULLY SUBMITTED,
THE DEFENDANT, CYNTHIA McCLENDON

BY: /s/

Robert C. Mirto
Mirto, Ketainck & DiCrosta, P.C.
140 Captain Thomas Blvd., P.O. Box 428
West Haven, CT 06516
Tph. #(203)932-2225
Fax #(203)934-4834
ct 00188

CERTIFICATION

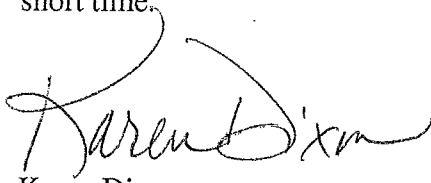
I hereby certify that on September 9, 2008, the Memorandum in Aid of Sentencing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ _____
Robert C. Mirto

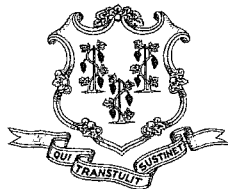
Dear Judge Arterton

My name is Karen Dixon and I live and work in New Haven, Connecticut. I have known Cynthia McClendon for 10 years. I first met her while I was interning at the Public Defender's Office for the State of Connecticut in 1998.

I knew Cynthia to be a very compassionate person. I can recall early in my internship and while I was in the process of moving, Cynthia was kind enough to offer her home to me during the two weeks that my apartment was not available. At the time, although it was a generous offer, I was surprised as she had only known me for 2 months. I never knew anyone to be so trusting in such a short time.

A handwritten signature in cursive script that reads "Karen Dixon". The signature is written in black ink and is positioned above the printed name.

Karen Dixon



State of Connecticut

DIVISION OF PUBLIC DEFENDER SERVICES

OFFICE OF PUBLIC DEFENDER
SUPERIOR COURT B. A. 23
121 ELM STREET
NEW HAVEN, CONNECTICUT 06510

JOAN A. LEONARD
SUPERVISORY ASSISTANT
PUBLIC DEFENDERS
TEL: (203) 789-7458
FAX: (203) 789-7542

August 26, 2008

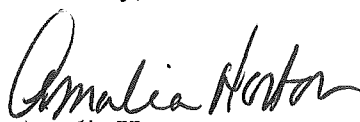
Judge Arterton

We write this letter in support of Cynthia Hayward-McClendon. Between the both of us we have known Cynthia for the past nine years. Cynthia was not only our co-worker but through the years she also became a close friend.

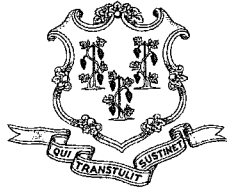
Our experiences working side by side with Cynthia were always positive. Cynthia has wonderful people skills. She was always willing to go beyond her duties to help our clients and to look out for their best interests. It is this exact good nature and trust in people that led to her current situation. Bobby and Phil Jacobs were able to take advantage of Cynthia's innocent disposition. While everyone in the courthouse believed that Bobby and Phil were corrupt, she refused to give into the courthouse gossip because she had known them for at least 20 years and felt they deserved the benefit of doubt. She truly believed that she was helping them at a time when others had abandoned them.

We hope the court is able to recognize who Cynthia truly is. She's a woman with a great deal of integrity, loyal to her friends, an outstanding single mother, and a devoted daughter. She has lost her self-esteem because of two men that have no idea what the terms social consciousness or community actually mean. These men will eventually go back to their families, their expensive homes, cars, and jobs. Cynthia has been stripped of something she truly loved, namely her job in the Public Defenders Office.

Sincerely,


Amalia Horton
Public Defender Secretary


Tonya Grace
Public Defender Clerk



State of Connecticut

DIVISION OF PUBLIC DEFENDER SERVICES

OFFICE OF PUBLIC DEFENDER
SUPERIOR COURT B. A. 23
121 ELM STREET
NEW HAVEN, CONNECTICUT 06510

JOAN A. LEONARD
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TEL: (203) 789-7458
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August 28, 2008

To Whom It May Concern:

I am writing this letter in regards to Cynthia Hayward-McClendon. I have worked with Cynthia for seven years as a clerk with the Public Defender's Office in New Haven. Cynthia and I worked closely together on a daily basis and I have to say it was a complete pleasure.

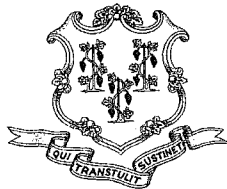
Cynthia has always been willing to do what ever was needed to be done to the best of her abilities in order to take care of our clients. She treated each and every client with respect, compassion, and dignity. She was a pleasure and inspiration to work with and I consider it a privilege to have been able to work with her.

I am asking the court to take into consideration Cynthia's treatment of our clients and her co-workers and extend this same compassion towards her.

Sincerely,

A handwritten signature in black ink that reads "Geraldyn Singh".

Geralyn Singh



State of Connecticut

DIVISION OF PUBLIC DEFENDER SERVICES

OFFICE OF PUBLIC DEFENDER
SUPERIOR COURT B. A. 23
121 ELM STREET
NEW HAVEN, CONNECTICUT 06510

JOAN A. LEONARD
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TEL: (203) 789-7458
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June 3, 2008

To Whom It May Concern:
McClendon

Re: Cynthia

I have worked in the same office as Cynthia for over three-years. During the time I have been here, she was usually at the front desk, helping clients of our office. She would help people to identify their attorney; direct them to the right court; input data to the computer, and other things of a similar nature.

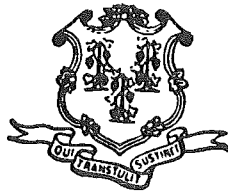
Cynthia was always trying to be as helpful as she could. She is a friendly person that tries to help others. She is able to simple things, but not complicated or very involved problems.

When I heard about the incident in which she was allegedly involved, I said to the three people that I was with that I didn't believe she had the capacity to knowingly scheme to obtain money illegally. If she is guilty of anything, it is that she trusted people more than she should have and was unable to protect her own interests because of dealing with the wrong people.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Chetwin".

Susan P. Chetwin
Assistant Public Defender



State of Connecticut

DIVISION OF PUBLIC DEFENDER SERVICES

OFFICE OF PUBLIC DEFENDER
SUPERIOR COURT, G.A. 6
121 ELM STREET
NEW HAVEN, CONNECTICUT 06510

August 27, 2008

JOAN A. LEONARD
SUPERVISORY ASSISTANT
PUBLIC DEFENDER
TEL. (203) 789-7458
FAX (203) 789-7542

Dear Judge Arterton:

I would like to address this court as a long time co-worker (and at one time her immediate supervisor) and friend of Cynthia Hayward-McClendon in the Public Defender Office, GA 23, 121 Elm St., New Haven, CT.

I have worked with Cynthia for 20 years. She was always willing to adapt to any changes made to our computer systems. Her strong point has always been dealing with the public. Cynthia exhibited respect, understanding and positive assistance to everyone and went that extra mile for our clients.

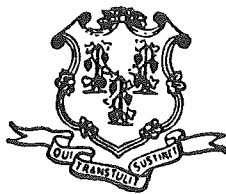
As far as I am concerned, her sentence began on December 8th, 2007, at which time the federal government agents picked her up at home and had taken her to the federal lock-up in New Haven. Even though her sentencing date is scheduled for September 3rd, 2008, that is not the end of her sentence. She has already been sentenced to the loss of her job, loss of her medical benefits, and a federal conviction on her record which will stifle her aim to secure other employment. End result? A 51 year old female, with pre-existing medical conditions, with elderly parents, having to wait four more years to be able to receive her pension benefits and medical benefits.

Cynthia was taken advantage of and basically set-up. I do not condone what occurred between her and the bondsman but she never initiated that type of exchange before. It was only after it was known that they had been indicted that "feeling sorry for them" she acquiesced in their scheme. Her ingenuous and compassionate nature led to her own downfall.

Please consider the background in which this incident took place and Cynthia herself at the time of her sentencing. I ask that you give her the most lenient sentence allowable.

Sincerely,

Heidi A. Bostgen



State of Connecticut

DIVISION OF PUBLIC DEFENDER SERVICES

OFFICE OF PUBLIC DEFENDER
SUPERIOR COURT, G.A. 6
121 ELM STREET
NEW HAVEN, CONNECTICUT 06510

JOAN A. LEONARD
SUPERVISORY ASSISTANT
PUBLIC DEFENDER
TEL. (203) 789-7458
FAX (203) 789-7542

August 26, 2008

Dear Judge Arterton:

I am writing this letter on behalf of Cynthia Hayward-McClendon.

I am a Senior Assistant Public Defender and have known Cynthia through the Public Defenders Office for approximately eighteen years. Let me amend the above to say it has been my privilege to have been associated with Cynthia through the Public Defenders Office for eighteen years. I consider her a colleague and a friend.

I have observed Cynthia through the years when she was well, when she was sick, through personal and professional periods of happiness and sadness and through personal and professional periods of tranquility and stress.

Throughout all these variegations, Cynthia was calm, professional, helpful, generous and honest. I cannot deduce the circumstances that have led her to her current situation, but I can reiterate that I am proud to know her and consider her a friend.

I ask the Court to consider Cynthia's many years of competent, generous and often "over the top" help to our client population; her stellar role in presenting to society her college-educated, estimable daughter; her selfless role as caretaker to two elderly and sick parents; and the total anomaly this case represents in Cynthia's entire life experience as a law-abiding, single, working black mother living in inner-city New Haven.

I ask the Court to grant Cynthia Hayward-McClendon the most lenient sentence possible.

Sincerely,

Kayel Adams, Esq.

August 26, 2008

111 Airline Rd.
Clinton, CT 06413

Dear Judge Arterton:

Cynthia Hayward-McClendon has worked for the New Haven GA Public Defenders office for 20 years and I have been her supervisor. From the outset she took special classes to improve skills left weak by a woefully inadequate education.

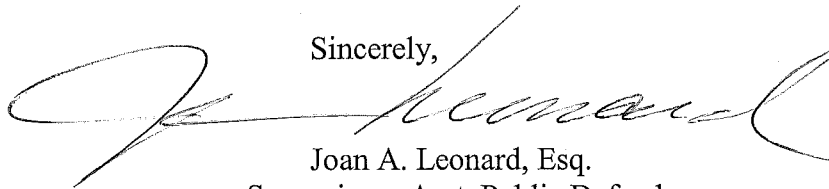
Other talents, however, were innate. She was able to calm clients who were hostile, angry or just confused. She treated all of our clients with compassion and remained professional in the face of outrageous behavior caused by drug or alcohol abuse or mental illness. Nothing rattled her steadiness or kindness.

This generosity of spirit has also meant that she often was taken advantage of by friends and family members. Though other relatives had greater resources and fewer obligations, it was Cynthia who took the responsibility for housing and caring for her elderly and ailing parents. She raised her personable and accomplished daughter to adulthood with minimal help from her ex-husband. It took numerous court orders to bring about even the smallest payment. Nonetheless Cynthia soldiered on struggling with college tuition, rent and food bills.

As she was vulnerable to exploitation by family and friends, she was also an easy target of the convicted bondsmen in her current situation. It is sadly ironic that these men will profit from the solicited misdeed of the very person they corrupted. It turns the concept of justice on its head.

I believe that Cynthia has learned a very hard lesson, that she will not be involved in criminal activity again, that she will remain open hearted and generous and that for her more than most the process has already been a serious punishment.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joan A. Leonard".

Joan A. Leonard, Esq.
Supervisory Asst. Public Defender

JAL/hab



State of Connecticut

DIVISION OF PUBLIC DEFENDER SERVICES

BEVIN SALMON

ASSISTANT
PUBLIC DEFENDER
121 Elm Street
New Haven, CT 06510

TEL: (203) 789-7458
FX: (203) 789-7542

August 22, 2008

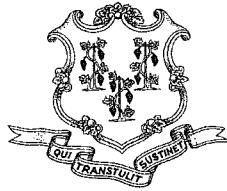
To Whom It May Concern:

I worked with Cynthia Hayward for approximately 5 years in the Public Defender's office in New Haven. Ms. Hayward was the secretary assigned to me. Ms. Hayward was not only a good secretary but she also impressed me as a good and decent human being. She was professional, courteous, and amiable in her interactions with staff, courthouse personnel, and the clients that we represented.

Sincerely

A handwritten signature in black ink, appearing to read "Bevin Salmon", with a long horizontal flourish extending to the right.

Bevin Salmon



State of Connecticut

DIVISION OF PUBLIC DEFENDER SERVICES

OFFICE OF PUBLIC DEFENDER
SUPERIOR COURT G. A. 23
121 ELM STREET
NEW HAVEN, CONNECTICUT 06510

August 20, 2008

JOAN A. LEONARD
SUPERVISORY ASSISTANT
PUBLIC DEFENDERS
TEL: (203) 789-7458
FAX: (203) 789-7542

Dear Judge Arterton:

I am writing this letter on behalf of my friend and former colleague, Cynthia Hayward-McClendon. I have known Cynthia for 20 years when my association with the Public Defender's Office was as a special public defender.


The person I have known exhibited many fine attributes but what comes to mind most often is her compassion and kindness for our clients. When there was a shooting at the court house she came to the aid of one of the victims. She was best at diffusing any agitated or angry disgruntled client without being asked.

I watched Cynthia take courses to try to improve her skills and I watched her struggle with raising her daughter as a single parent who was traumatized by a difficult and abusive first marriage.

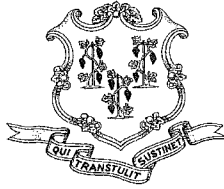
My most recent memories of Cynthia are caring for her elderly parents and worrying about the welfare of her second husband.

I ask the court to show Cynthia the same compassion that she always demonstrated toward our clients. This incident does not define the character of Cynthia. I write this letter with the same respect, affection and admiration that I have always had for Cynthia.

Sincerely,


Janet Perrotti
152 Greenway St.
Hamden, CT 06517

JP/hab



State of Connecticut

DIVISION OF PUBLIC DEFENDER SERVICES

OFFICE OF PUBLIC DEFENDER
SUPERIOR COURT B. A. 23
121 ELM STREET
NEW HAVEN, CONNECTICUT 06510

JOAN A. LEONARD
SUPERVISORY ASSISTANT
PUBLIC DEFENDERS
TEL: (203) 789-7458
FAX: (203) 789-7542

April 29, 2008

To Whom It May Concern:

I have worked with Cynthia Hayward for the past 18 ½ years. She handled most of my clerical and secretarial work. I considered her not just a competent employee, who could be trusted to handle confidential information with discretion and tact, but also as a valued colleague. Cynthia was always open, direct and honest in her dealings with me. She had more than her share of hurdles to clear in life and faced them with good humor and grace.

Above all, Cynthia is a good hearted and compassionate woman. I hope that others will find it in their hearts to treat her with a similar compassion.

Very Truly Yours,

A handwritten signature in black ink, appearing to read "J. M. Chase".

James M. Chase
Sr. Asst. Public Defender



Office of Chief Public Defender
State of Connecticut

30 TRINITY STREET, 4TH FLOOR
HARTFORD, CONNECTICUT 06106
TEL (860)509-6429
FAX (860)509-6499
susan.storey@jud.ct.gov

ATTORNEY SUSAN O. STOREY
CHIEF PUBLIC DEFENDER

August 29, 2008

Attorney Nora Dannehy
Acting U.S. Attorney
157 Church Street, 23rd Floor
New Haven, CT 06510

Re: Cynthia McClendon Hayward

Dear Attorney Dannehy,

I am writing in reference to Ms. Cynthia McClendon Hayward. Unfortunately, her case presents a serious breach of the integrity of attorney-client confidential files in the New Haven G.A. Public Defender Office. It is my understanding that Ms. Hayward, while employed by the Division of Public Defender Services, supplied client files containing confidential and privileged information to unauthorized individuals in exchange for money.

Notwithstanding the facts of this case, the Office of Chief Public Defender respectfully requests that she not be incarcerated for her transgression. Ms. Hayward was a valuable employee of the Division for many years. While we are truly disappointed in her behavior which violated the trust of colleagues and clients, there were also many instances where Ms. Hayward performed above and beyond her required responsibilities to assist clients.

Furthermore, Ms. Hayward has resigned from her position as an employee of the Division. The loss of her employment and the trust of her colleagues will certainly cause her financial and emotional hardship and may be sufficient punishment in itself.

Sincerely,

Susan O. Storey
Susan O. Storey
Chief Public Defender

CYNTHIA McCLENDON
125 OLIVE STREET, UNIT G4
NEW HAVEN, CT 06511
(203)781-8449

June 2, 2008

Via Facsimile 860-509-6495
and Regular Mail

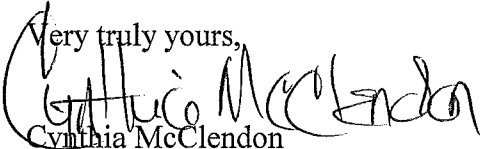
Attorney Deborah DelPrete Sullivan
Legal Counsel
Office of the Chief Public Defender
30 Trinity Street, 4th Fl.
Hartford, CT 06106

Dear Attorney Sullivan:

I am writing this letter to advise you that I am resigning from employment with the State of Connecticut, Public Defender's Office in New Haven effective immediately. It is my understanding that I am entitled to my accrued vacation time.

It has been a pleasure working for the State of Connecticut and I wish to thank you for the consideration that you have shown me.

Very truly yours,


Cynthia McClendon