

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Norfolk Division

UNITED STATES OF AMERICA)	CRIMINAL NO. 2:12cr127
)	
v.)	
)	
DAVID LEE JONES, III,)	
)	
Defendant.)	

**GOVERNMENT’S OBJECTIONS TO THE
PRESENTENCE REPORT**

The United States of America, through its representative Amy E. Cross, Special Assistant United States Attorney, and notes the following objections to the Presentence Investigation Report (“PSR”), prepared by the United States Probation Office.

1. With regard to the Defendant’s Charge(s) and Conviction(s) under PART A of the Pre-Sentence Investigation Report, the United States would respectfully add that, in addition to the described conduct violating the Defendant’s bond, the Defendant also tested positive for narcotics while on pre-trial release and attempted to use stored urine to falsify test results during testing with the United States Probation Department. These behaviors combined with those described in the pre-sentence investigation report were the grounds for the Defendant’s bond revocation on August 17, 2012. PSR ¶ 3.

2. Since the entry of the Defendant’s guilty plea, CD#1, Keith Allen Taylor, has entered a guilty plea before this Honorable Court. In his Statement of Facts, Taylor agreed that he imported between one and three kilograms of Methylone from China ten or eleven times since the summer of 2011. He also admitted and maintained that he provided co-defendant David

CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of February, 2013, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification to the following:

Benjamin H. Hamlet, Esquire
1244 Perimeter Parkway, Suite 441
Virginia Beach, Virginia 23454

I HEREBY CERTIFY that on this 19th day of February, 2013, I mailed/electronically sent a true and correct copy of the foregoing to the following:

Karen R. Franklin
U.S. Probation Officer
1001 Omni Boulevard, Suite 300
Newport News, Virginia 23606

By: _____/s/_____
Amy E. Cross
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