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6  
7 Counsel for Defendant  
8 AARON SANDUSKY

9  
10 UNITED STATES DISTRICT COURT  
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA, ) Case No. 12-548-PA  
13 )  
14 Plaintiff, ) **DEFENDANT'S NOTICE OF MOTION**  
15 ) **AND MOTION TO TERMINATE**  
16 v. ) **SUPERVISED RELEASE**  
17 )  
18 AARON SANDUSKY, *et al.* ) Date: July 18, 2022  
19 ) Time: 3:00 p.m.  
20 ) Place: The Courtroom of the Honorable  
21 Defendants. ) Percy Anderson (Courtroom 9A)  
22 )  
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29 TO ALL PARTIES AND COUNSEL OF RECORD:

30 PLEASE TAKE NOTICE that on July 18, 2022, at 3:00 p.m. in the Courtroom of the  
31 Honorable Percy Anderson, or as soon thereafter as this matter may be heard, defendant Aaron  
32 Sandusky will and hereby does move this Court for an order granting his motion to terminate  
33 supervised release. This motion is based on this notice of motion and memorandum of points and  
34 authorities, the accompanying declaration and exhibits, 18 U.S.C. §§ 3553 and 3583(e)(1) and all  
35 statutory authority cited; the arguments of counsel and exhibits presented at the hearing; and the  
36 records of this case.

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1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **INTRODUCTION**

3 All too frequently forgotten in our criminal justice system are those defendants who have  
4 served their terms of incarceration, yet remain under federal supervision far more than is necessary to  
5 serve its rehabilitative goals. Not only does this hinder the person’s ability to reintegrate fully into  
6 society, but it wastes scarce judicial resources. Unlike incarceration, which is punitive in nature, the  
7 purpose of supervised release is to assist individuals in their transition to community life. Mr.  
8 Sandusky has performed his supervised term commendably – he has secured steady employment,  
9 maintained a stable family life, and has not committed any crimes. Despite the praiseworthy efforts  
10 Sandusky has taken to reintegrate himself into society, he needlessly remains under the supervision of  
11 the United States Probation Department, based on his five-year mandatory term of supervised release.  
12 Not only does this continued federal supervision of Sandusky fail at this point to advance the  
13 rehabilitative purpose of supervised release, but it *undermines it* by hindering Sandusky’s ability to  
14 perform his job to the fullest, at the public’s expense. Under 18 U.S.C. § 3583(e)(1), this Court is  
15 empowered to terminate supervised release after one year for individuals like Mr. Sandusky, and, as  
16 the Judicial Conference recognized, there is a presumption that it should do so after the defendant  
17 serves more than 18 months of his term of supervision, if he meets the enumerated criteria. For these  
18 reasons and others, Mr. Sandusky respectfully requests this Court to grant the instant motion to  
19 terminate the remainder of his five-year term of supervised release.

20 **STATEMENT OF FACTS**

21 Aaron Sandusky is a fifty-two year old man who, on January 7, 2013, was sentenced to a ten-  
22 year term of incarceration and five-year term of supervised release for distributing medical  
23 marijuana, 18 U.S.C. §§ 841 & 846, a federal crime that is now legal in many states. He was  
24 released from custody on approximately March 12, 2020, and has served more than two years of his  
25 five-year term of supervised release. While on supervised release, he has obtained a job as an  
26 account manager and project manager for Dome Garden Supplies, which, according to his employer,  
27 he has performed commendably. *See* Letter from Michael Adbelmalek, General Manager, Dome  
28 Group (“Adbelmalek Letter”) (attached hereto as Exhibit 1). He maintains a stable family life, as he

1 remains in a fifteen-year relationship with his girlfriend, who has remained at his side throughout his  
2 incarceration and to this very day. *See* Letter from Darlene Buenrostro (“Buenrotro Letter”)  
3 (attached hereto as Exhibit 2); Declaration of Aaron Sandusky in Support of Motion to Terminate  
4 Supervised Release (“Sandusky Decl.”) ¶4. During Sandusky’s incarceration, he was a model  
5 inmate without even a single citation for a prison rule violation. *Id.* ¶1. He completed the prison’s  
6 500-hour Residential Drug Abuse Program and has not committed any crimes in the last two years  
7 while has been on supervised release. *See id.* ¶¶2 & 6.

### 8 LEGAL STANDARDS

9 The Supreme Court has announced that the purpose of supervision is not to punish  
10 individuals, but to assist them in their transition to community life. *United States v. Johnson*, 529  
11 U.S 53, 59 (2000) (“Supervised release fulfills rehabilitative ends, distinct from those served by  
12 incarceration”) (citations omitted); *see also* S.Rep. No. 98-225, p. 124 (1983) (declaring that “the  
13 primary goal [of supervised release] is to ease the defendant’s transition into the community after the  
14 service of a long prison term for a particularly serious offense”); *United States v. Shaw*, -- F.Supp.3d  
15 --, 2020 WL 1062896 (D. Colo. March 5, 2020) (noting “shift in focus from coercing a person to act  
16 lawfully to monitoring and fostering a person’s ability to self-manage lawful behavior and desire to  
17 act lawfully”); *United States v. Trotter*, 321 F.Supp.3d 337, 339-41 (E.D.N.Y. July 12, 2018)  
18 (“Supervised release is designed to assist with rehabilitation, not to punish”). To this end, 18 U.S.C.  
19 § 3583(e)(1) authorizes the court, after considering the factors set forth in 18 U.S.C. § 3553 to  
20 terminate supervised release “at any time after the expiration of one year of supervised release” and  
21 “is satisfied that such action is warranted by the conduct of the defendant released and the interest of  
22 justice.” 18 U.S.C. § 3583(e)(1); *United States v. Harris*, 689 F.Supp.2d 692, 694 (S.D.N.Y. 2010).  
23 After one year of supervised release, the court is authorized to terminate it any time thereafter, even if  
24 the defendant was initially sentenced to a mandatory minimum supervised release term. *See, e.g.,*  
25 *United States v. Spinnelle*, 41 F.3d 1056, 1060 (6th Cir. 1994).

26 Under section 3553, the factors the courts must consider in ruling on motions to terminate  
27 supervision are as follows:

28 [T]he nature and circumstances of the offense and the characteristics of the defendant;  
the need for the sentence to reflect the seriousness of the offense, promote respect for

1 the law and provide just punishment for the offense; afford adequate deterrence to  
2 criminal conduct; protect the public from further crimes of the defendant; provide the  
3 defendant with needed educational or vocational training, medical care, or to other  
4 correctional treatment; the kinds sentence and sentencing range established for the  
5 applicable category of offense committed by the applicable category of offense as set  
6 forth in the Sentencing Guidelines; and pertinent policy statement issued by the  
7 Sentencing Commission; the need to avoid unwarranted sentencing disparities; and the  
8 need to provide restitution to victims of the offense.

9 *Harris*, 689 F.Supp.2d at 694, n.3. After imposing a supervised release term, the court may consider  
10 equitable factors, such as the conduct of the defendant and the interest of justice, as a basis to modify  
11 or terminate his conditions of supervised release. *See Johnson*, 529 U.S. at 60 (citing 18 U.S.C. §  
12 3583(e)(2)). “The public interest is best served by terminating supervise release [in appropriate  
13 circumstances], which will allow the Probation Office to invest the public’s limited resources on  
14 those who are in need of supervision. Clearly there is no benefit to be derived by maintaining a  
15 supervised release at public expense over someone who has proven himself to be beyond  
16 supervision.” *United States v. Chapman*, 827 F.Supp. 369, 372 (E.D. Va. 1993); *see United States v.*  
17 *Corbett*, 2019 WL 2110367, at \*1 (D. Idaho May 14, 2019) (“The public interest is no longer served  
18 by expending taxpayer funds (even at a reduced level) to monitor Mr. Corbett's activities.  
19 Accordingly, it is in the interest of justice to terminate Mr. Corbett's supervised release”); *see also*  
20 *United States v. Trotter*, 321 F.Supp.3d 337, 339-41 (E.D.N.Y. July 12, 2018) (“As a result in these  
21 errors in our sentencing practice [for habitual marijuana users], money and the time of our probation  
22 officers are wasted, and supervisees are unnecessarily burdened” “The cost to tax-payers of long,  
23 repeating sentences and extended, unnecessary supervised release is substantial”).<sup>1</sup>

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27 <sup>1</sup> In *Trotter*, Judge Weinstein pointed out that the terms and conditions of supervised release are often  
28 ignored by defense counsel, Assistant United States Attorneys, and the courts. *Trotter*, 321  
F.Supp.3d at 340. “Going forward, more careful consideration attention should be given to the  
potential of supervised release, and its duration, to help—or to prevent—rehabilitation.” *Id.*; *see id.*  
at 365 (recommending that courts automatically raise the issue of early termination of supervised  
release in all cases after one year, since 18 U.S.C. § 3583 is hardly used).

1 **ARGUMENT**

2 **EARLY TERMINATION OF SANDUSKY’S TERM OF SUPERVISED RELEASE IS IN THE**  
3 **INTEREST OF JUSTICE**

4 As noted, 18 U.S.C § 3583(e)(2) authorizes federal courts to terminate an individual’s  
5 supervised release “at any time after the expiration of one year . . . if it is satisfied that such action is  
6 warranted by the conduct of the defendant released and the interest of justice.” Such is the case here.  
7 Sandusky was a model inmate during his ten years of incarceration -- he was not written up even a  
8 single time for any rules violations during this lengthy sentence. *See* Sandusky Decl. ¶1. He  
9 completed the prison’s 500-hour Residential Drug Abuse Program and has not committed any crimes  
10 during his more than two years on supervised release. *See id.* ¶¶2 & 6. He has maintained a stable  
11 relationship with his family, including his fifteen-year relationship with his girlfriend who has, to her  
12 great credit, stood by him throughout this ordeal. *See* Buenrostro Letter (Exh. 2); Sandusky Decl. ¶4  
13 *cf. United States v. Shaw*, \_\_\_ F.Supp.3d \_\_\_, 2020 WL 1062896, at \*5 (“Mr. Shaw’s deep relationship  
14 with his partner . . . demonstrates that he is motivated to remain a law-abiding citizen beyond the  
15 term of supervised release”). Especially in light of Sandusky’s “low” risk assessment and transfer to  
16 low-risk supervision by probation,<sup>2</sup> “the general interests that undergird sentencing decisions will not  
17 be impeded by this early termination.” *See Shaw*, 2020 WL 1062896, at \*5.

18 Furthermore, in his approximately two years of supervised release, Sandusky has obtained  
19 and held a steady job as an account manager and project manager for Dome Gardening, which has  
20 prompted his employer to lavish high praise upon him. *See* Adbelmalek Letter (Exh. 1) (“In his two  
21 and a half years with the company, he has proven to be of high value in helping to keep our business  
22 afloat;” “I would like to stress how valuable Mr. Sandusky has been to our business”); Sandusky  
23 Decl. ¶3. Because one of Sandusky’s job responsibilities is to travel on short notice to troubleshoot  
24 problems encountered by his clients on-site, terminating Sandusky’s supervised release will assist in  
25 his employment, since his supervision prevents him from traveling without advance permission. *See*  
26 Adbelmalek Letter (Exh. 1); Sandusky Decl. ¶3; *cf. United States v. Etheridge*, 999 F.Supp.2d 192,

27 \_\_\_\_\_  
28 <sup>2</sup> The undersigned counsel spoke with the Probation Office and was informed that Sandusky has been transferred to low-risk supervision. It is Sandusky’s understanding that he has been assessed by the Probation Office as “low” risk.

1 193 (D.D.C. 2013) (granting defendant’s motion for early termination of supervised release, noting  
2 defendant “had recently been promoted to a position that required travel on short notice, but the  
3 conditions of his release prevented him from traveling without permission”); *see also United States v.*  
4 *Schuster*, 2002 WL 31098493, at \*1 (S.D.N.Y. Sept. 19, 2002) (“It is of value both to defendant and  
5 his family and also to the community for [defendant] to obtain productive employment which utilizes  
6 his considerable talents. It is distinctly possible that termination of defendant’s probation will assist  
7 in this regard”).

8         The lone blemish on Sandusky’s otherwise impeccable record during his twenty-seven  
9 months of federal supervision is a single positive test result for having marijuana metabolites in his  
10 system, which resulted from his taking a cannabidiol gummy (CBD sleep-aid) to treat his anxiety and  
11 help him sleep. Sandusky Decl. ¶5 & 6. But this should not serve as a reason to deny the instant  
12 motion, as Sandusky immediately stopped using any CBD products once he was informed by the  
13 Probation Office that they contained THC and has tested positive since. In *United States v. Johnson*,  
14 228 F.Supp.3d 57 (D.D.C. 2017), wherein the court terminated supervision for a defendant who had  
15 taken “affirmative steps to become a well-integrated member of the community” and used marijuana  
16 for medical purposes, the court held that “with the exception of his use of medical marijuana, he has  
17 not violated the terms of his supervised release. Even his use of medical marijuana, the undersigned  
18 finds, was not the result of a willful violation.” *Id.* at 63. “[B]y present-day measures of sentences  
19 suitable to Defendant and his crime, the undersigned believes that Defendant has been punished  
20 sufficiently for the crime that he committed a decade ago.” *Id.* at 64; *see also United States v.*  
21 *Trotter*, 321 F.Supp.3d 337, 341 (E.D.N.Y. July 12, 2018) (“Like many federal trial judges, I have  
22 been terminating supervision for “violations” by individuals with long-term marijuana habits who are  
23 otherwise rehabilitated. No useful purpose is served through the continuation of supervised release  
24 for many defendants whose only illegal conduct is following the now largely social habit of  
25 marijuana use”).<sup>3</sup>

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27 <sup>3</sup> In his eloquent and thoroughly reasoned opinion in *United States v. Trotter*, Judge Weinstein  
28 explained how a drug testing provision of supervised release for a habitual marijuana user not only  
wastes public resources, but it “trap[s] some defendants, particularly substance abusers, in a cycle  
where they oscillate between supervised release and prison.” *Id.* at 339. He explains as follows:

1 Thus, as was true in *United States v. Chapman*, 827 F.Supp. 369 (E.D. Va. 1993):

2 The public interest is best served by terminating the supervised release, which  
3 will allow the Probation Office to invest the public’s limited resources on those who  
4 are in need of supervision. Clearly there is no benefit to be derived by maintaining a  
5 supervised release at public expense over someone who has proven himself to be  
6 beyond the need for supervision.

7 *Id.* at 371.

8 To like effect, in *United States v. Harris*, 689 F.Supp.2d 692 (S.D.N.Y. 2010), the court held:

9 “[The defendant’s] conduct post-conviction has been beyond reproach. He was  
10 apparently a model prisoner during a long term of incarceration. He has fully  
11 complied with the terms and conditions of supervised release. He has obtained and is  
12 pursuing productive employment. He is caring for his family.

13 \* \* \*

14 There are two possible resolutions to this case. The Court can terminate  
15 Harris’ supervised release, do away with crippling obstacles to his professional  
16 advancement, and make straight his path to rehabilitation and redemption. Or the  
17 Court can require Harris to serve his full term of supervised release, leave him blocked  
18 and at risk in his employment, and confer no benefit or any significance upon the  
19 victimized banks. Which resolution is “in the interest of justice?” The question is not  
20 close. Justice requires the termination of Harris’ supervised release.

21 *Id.* at 694-96.

22 Indeed, in *United States v. Shaw*, \_\_\_ F.Supp.3d \_\_\_, 2020 WL 1062896 (D. Colo. March 5,  
23 2020), the court recognized that “[f]or a defendant who requests early termination after serving 18 or

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24 [This is] the sinister side of probation the place where the promise of redemption is  
25 subverted by a lurking punitiveness . . . . Sanctions imposed for probation violations . .  
26 . frequently lead to disproportionate sentences, with probation merely becoming a  
27 staging area for eventual imprisonment.

28 *Id.* at 339-340 (quoting Nora V. Demleitner, *How to Change the Philosophy and Practice of  
29 Probation and Supervised Release: Data Analytics, Cost Control, Focus and Reentry, and a Clear  
30 Mission*, 28 Fed. Sent’g Rep. 231, 232 (internal quotation marks omitted)). “The current reflexive  
31 use of longer than needed supervised release periods may increase the likelihood of recidivism.”  
32 *Trotter*, 321 F.Supp.3d at 362 (citation omitted); *see also id.* at 363 (“Studies have consistently found  
33 that ‘we could maintain public safety and possibly even improve it with *less* supervision—that is,  
34 fewer rules about how individuals must spend their time and less enforcement of those rules”)  
35 (emphasis in original) (citation omitted).

1 more months of supervised release, ‘there is a presumption of recommending early termination for  
2 persons who meet the [enumerated criteria].’” 2020 WL 1062896, at \*3 (quoting Judicial  
3 Conference, *Guide to Judiciary Policy*, Vol. 8 (Probation and Pretrial Services, Part E (Post-  
4 Conviction Supervision), § 360.20(c)). These criteria are as follows:

- 5 (1) The person does not meet the criteria of a career drug offender or career criminal . . . or  
6 has not committed a sex offense or engaged in terrorism;
- 7 (2) The person presents no identified risk of harm to the public or victim;
- 8 (3) The person is free from any court-reported violations over a 12-month period;
- 9 (4) The person demonstrates the ability to lawfully self-manage beyond the period of  
10 supervision;
- 11 (5) The person is in substantial compliance with all of the conditions of supervision; and
- 12 (6) The person engaged in appropriate prosocial activities and receives sufficient prosocial  
13 support to remain lawful well beyond the period of supervision.

14 *Id.* at \*3 (quoting Judicial Conference, *Guide to Judiciary Policy*, Vol. 8 (Probation and Pretrial  
15 Services, Part E (Post-Conviction Supervision), § 360.20(c)(1)-(6)). Based on these and the statutory  
16 factors, the court granted defendant’s motion for early termination. *Shaw*, 2020 WL 1062896, at \*6  
17 (“Mr. Shaw’s conduct evinces a person who has been rehabilitated and is ready to fully transition into  
18 society as a law-abiding citizen,” so “early termination of supervised release is warranted in the  
19 interest of justice;” “The Court extends its heartfelt congratulations to Mr. Shaw and wishes him luck  
20 as he endeavors to live a fruitful and fulfilling life”).

21 As in *Shaw*, *Harris* and the other cases cited, Sandusky’s conduct while on supervised release  
22 has been exemplary -- he has secured steady employment, maintained a stable family life, and has not  
23 committed any crimes. *See supra* at 2-3 & 5-6. He meets all of the criteria for early termination of  
24 supervised release that are set forth by the Judicial Conference, as discussed by *Shaw*, so there is a  
25 presumption in favor of granting the instant motion. *See Shaw*, 2020 WL 1062896, at \*3.<sup>4</sup>

26 Numerous courts have terminated supervised release early under similar circumstances. *See, e.g.,*

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27 <sup>4</sup> While considering when to file the instant motion, Factor 3, which is whether “the person is free  
28 from any court-reported violations over a 12-month period,” was a significant factor in Sandusky’s  
decision to wait until June 8, 2022, to file the instant motion, since he failed a drug test on June 7,  
2021.



1 *United States v. Spinelle*, 41 F.3d 1056, 1061 (6th Cir. 1994) (affirming trial court order terminating  
2 supervised release where defendant served one-year of five-year term for manufacturing marijuana);  
3 *United States v. Walters*, 2021 WL 4991510, at \*1 (D. Idaho Apr. 12, 2021) (terminating supervised  
4 release after defendant served 18 months of three-year term for distribution of marijuana and  
5 methamphetamine); *Shaw*, 2020 WL 1062896, at \*6 (granting motion to terminate supervised release  
6 for armed robbery; noting “[t]his court has frequently granted motions for early termination”)  
7 (collecting cases); *United States v. Gainer*, 936 F.Supp. 785, 786-87 (D. Kan. 1996) (granting motion  
8 for early termination of supervised release after defendant served 22 months of a five-year term of  
9 supervised release for marijuana offense); *United States v. Long*, Case No. 2:21-cr-00026-RSL (W.D.  
10 Wash. May 31, 2022) (granting motion for early termination of supervised release for defendant  
11 convicted of marijuana-related offenses after he served just over a year of his mandatory 5-year term  
12 of supervised release). “[B]y present-day measures of sentences suitable to Defendant and his crime,  
13 the . . . Defendant has been punished sufficiently for the crime that he committed a decade ago.”  
14 *Johnson*, 228 F.Supp.3d at 63-64.

### 15 CONCLUSION

16 For the foregoing reasons, Sandusky respectfully requests this Court to grant the instant  
17 motion to terminate his supervised release.

18  
19 DATED: June 8, 2022

Respectfully Submitted

20  
21 /s/ Joseph D. Elford

22 \_\_\_\_\_  
JOSEPH D. ELFORD  
23 Counsel for Defendant

24 AARON SANDUSKY  
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# **EXHIBIT 1**

Dome Group  
12 Pinnacle Road  
Altona North, Victoria 3025, Australia

June 6, 2022

Honorable Percy Anderson  
United States District Court  
For The Central District of California

Dear Judge Anderson:

I am writing regarding the request of termination of supervised release for Aaron Sandusky that is presently before the court. I am the General Manager of Dome Group in Australia of whom Mr. Sandusky directly reports to in his current role of employment based in our USA location.

Mr. Sandusky has been employed with our company since November 2019; immediately after his release from prison. We understood the challenges that might arise in providing employment to a newly released individual, but we decided to provide this opportunity based on the merits of previous employment history and his overall business knowledge. Mr. Sandusky's current position is as a Sales Representative that consists of managing our current customer base as well as generating new business. In his two and a half years with the company, he has proven to be of high value in helping to keep our business afloat during the challenging times we faced in the worldwide pandemic. During this time, our USA location faced several adversities that forced us to downsize over 50% and fully re-structure our business operations. We were fortunate enough to have Mr. Sandusky on board to help facilitate these changes. As our focus is to rebuild, it is our intent to utilize Mr. Sandusky's expertise in developing new business. In order to do this, it would require travel to other states as well as other countries on short notice where we are focusing generating new business from. It is my understanding that the provisions in Mr. Sandusky's probation requires prior approval for him to travel which can impair his ability to respond to our clients' needs quickly to perform on-site troubleshooting. Although we always strive to plan travel in advance, it has been our experience that travel for the purpose of business development often needs to occur quickly in order to be successful.

I would like to stress how valuable Mr. Sandusky has been to our business and it is my hope that the court is favorable in this decision that will give us the ability utilize Mr. Sandusky's expertise to his fullest potential in this crucial time of rebuilding.

Sincerely,



Mina Abdelmalek | General Manager

# **EXHIBIT 2**

Darlene Buenrostro  
160 N Hacienda Ave  
Glendora, CA 91741

June 2, 2022

Honorable Percy Anderson  
United States District Court  
For The Central District of California

Dear Judge Anderson:

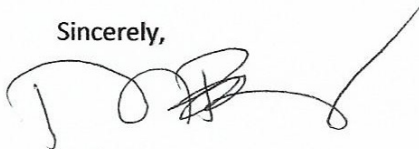
I am writing today in regards to the motion before you requesting to grant termination of supervised release for Aaron Sandusky. I want the Court to know that terminating Mr. Sandusky's supervision would greatly affect my life positively as well.

I have been in a deep relationship with Mr. Sandusky since 2006. Since I met him, I have known him to be an extremely caring, respectable, genuine man with a heart of gold. Unfortunately, due to some flawed decisions Aaron made approximately 5 years into our relationship, he was convicted of the crimes that were tried before this Court. Aaron's sentence of 120 months was a traumatic experience for me as well. Although he and I are not legally married, I remained committed to our relationship and served the sentence with him. It was a tough task to manage my life without him and to navigate the processes of visitation and phone calls, but we jumped over every hurdle and made it work. Aaron was transferred to serve his sentence in Texas and then in Colorado for the last year. Due to the distance and the financial hardship I was experiencing, I was only able to visit him twice a year. Aaron made every attempt possible to try to call me as often as he could. During the 89 months that Aaron was away, many people told me that I was a good woman for standing by his side throughout his incarceration. My response to that was always, "imagine how good a man he is for me to decide to stay". Aaron is not without flaws, as I do not believe any human is without flaws, but his character is definitely one in a million.

Aaron was released from prison in November 2019 to home confinement for four months. That period was very challenging, as it required me to be available to drive him to several weekly scheduled and random check-in appointments along with driving him to work and any other necessary pre-approved movements. His continued supervision also impedes our ability to travel together.

I urge this Court to grant Aaron's motion to terminate supervised release so we can have an opportunity to fully put this dark period behind us and move forward to rebuild our lives.

Sincerely,

A handwritten signature in black ink, appearing to be 'Darlene Buenrostro', with a long, sweeping flourish extending to the right.

Darlene Buenrostro

1 **CERTIFICATE OF SERVICE**

2 I am a resident of the State of California over the age of eighteen years and not a party to this  
3 action. My business address is 1875 Mission Street #101, San Francisco, CA 94103. On June 8,  
4 2022, I filed the within documents on the Court’s ECF system and served them:

5 **Motion to Terminate Supervised Release with Exhibits; Declaration of Aaron Sandusky in**  
6 **Support of Motion to Terminate Supervised Release**

7 via first-class mail and upon:

8 United States Attorney’s Office  
9 Central District of California  
10 411 W. 4th Street #8000  
11 Santa Ana, CA 92701

12 I declare under penalty of perjury under the laws of the State of California that the above is true  
13 and correct.

14 Executed on this 8th day of June, 2022, in San Francisco, California.

15 /s/ Joseph D. Elford

16 \_\_\_\_\_  
17 JOSEPH D. ELFORD  
18 Counsel for Defendant

19 AARON SANDUSKY  
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