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8 Attorneys for Plaintiff
UNITED STATES OF AMERICA

9 UNITED STATES DISTRICT COURT

10 FOR THE CENTRAL DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 MARC EDWARD MANI,

15 Defendant.

No. CR 17-322-RGK

SUPPLEMENT TO GOVERNMENT'S
POSITION RE: SENTENCING OF
DEFENDANT

Hearing Date: September 17, 2018
Hearing Time: 10:00 a.m.

Courtroom: Courtroom 850
Roybal Federal Building
and U.S. Courthouse 255
E. Temple Street
Los Angeles, CA 90012

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21 Plaintiff, the United States of America, by and through its
22 counsel of record, the United States Attorney for the Central
23 District of California, files this supplement to the government's
24 sentencing position for defendant MARC EDWARD MANI.

25 On September 4, 2018, the United States filed its sentencing
26 position in the abovementioned case. (ECF No. 25). As part of its
27 sentencing position, the United States recommended that defendant be
28 ordered to pay restitution in the amount of \$283,887.92, as opposed

1 to the \$637,878 restitution figure referenced in defendant's plea
2 agreement. The government made this recommendation in order to take
3 account of payments made to the Internal Revenue Service ("IRS") by
4 defendant prior to the filing of the government's sentencing
5 position.

6 Following the filing of the government's sentencing position,
7 defendant made additional payments to the IRS in satisfaction of his
8 outstanding tax liabilities for the periods at issue in this case.
9 Accordingly, the government hereby revises its sentencing position,
10 and recommends that no order of restitution be made by the Court in
11 this case. In all other aspects, the government's sentencing
12 position remains unchanged.

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14 Dated: September 14, 2018

Respectfully submitted,

15 NICOLA T. HANNA
United States Attorney

16 THOMAS D. COKER
17 Assistant United States Attorney
18 Chief, Tax Division

19 /s/

20 JAMES C. HUGHES
Assistant United States Attorneys

21 Attorneys for Plaintiff
22 UNITED STATES OF AMERICA
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