


the defendant or to the United States, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

37. The actions of the defendant, as recounted above, were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reason.

Respectfully submitted,

Tracy Doherty-McCormick
Acting United States Attorney

By: 

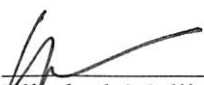
Colleen E. Garcia
Gordon D. Kromberg
Assistant United States Attorneys

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, SEAN ANDREW DUNCAN, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.



SEAN ANDREW DUNCAN

I am SEAN ANDREW DUNCAN's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.



Elizabeth Mullin
Assistant Federal Public Defender
Attorney for SEAN ANDREW DUNCAN