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Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

No. 3:21-cr-00167-SI

Plaintiff,

**DEFENDANT'S SENTENCING
MEMORANDUM**

v.

ERIC WADE LYSNE,

Defendant.

On March 9, 2022, Eric Lysne will appear before the Court to be sentenced following his guilty plea to one count of Wire Fraud in violation of 18 U.S.C. § 1343 and one count of Bank Fraud in violation of 18 U.S.C. § 1344. Mr. Lysne has reviewed the Presentence Investigation Report (PSR) and he has no objections to its advisory guidelines calculations.

As detailed in a supplement to the PSR provided to the Court contemporaneously with this memorandum, Mr. Lysne experienced a traumatic childhood that resulted in his

early exposure to methamphetamine at age seventeen. For years, Mr. Lynse struggled with a severe drug addiction and mental health issues, never receiving effective treatment. Since being released to inpatient treatment in July 2021, Mr. Lysne has made extraordinary progress. Among other things, Mr. Lysne has:

- Graduated from inpatient treatment at Volunteers of America where he was selected to serve as a leader on the “Client Council” and was universally described a role model to other residents;
- Addressed his trauma for the first time in his life while engaging in life changing mental health counselling;
- Excelled in outpatient treatment where he has been chosen to be the resident manager of a new sober housing facility opening this month in Portland;
- Engaged in community service work twice weekly where he is described as a wonderful volunteer who works hard to give back to the community; and
- Enrolled in college where he is earning straight A’s, is on track to earn a certificate as a Certified Alcohol & Drug Counselor in one year and will be pursuing his master’s degree as he embarks on a career helping men and women suffering from drug addiction.

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Based on the unique facts of this case and Mr. Lysne's present status as a sober, stable, responsible and valuable member of the recovery community and society as a whole, Mr. Lysne will ask that Court sentence him to time-served to be followed by a period of five years' supervised release with conditions that Mr. Lysne engage in 200 hours of community service work, remain on home confinement for a period of one year and immediately seek employment to begin making restitution payments to the government.

Respectfully submitted this 2nd day of March, 2022.

/s/ Conor Huseby

Conor Huseby

Assistant Federal Public Defender