

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

v.

LORD ANING,

Defendant.

HON. JED S. RAKOFF U.S.D.J.

Crim. No. 21-CR-88 (JSR)

**SENTENCING MEMORANDUM FOR DEFENDANT
LORD ANING**

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On the Brief:

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PRELIMINARY STATEMENT

For nearly 30 years, Defendant Lord Aning lived a law-abiding life.

A brief, unexplainable period of poor decision-making in an otherwise flawless life resulted in Mr. Aning entering a plea to Count One of the Indictment that charged him with conspiracy to engage in wire fraud in violation of Title 18, United States Code, Section 1349.

Mr. Aning has accepted full responsibility for his conduct and is scheduled to appear before Your Honor to be sentenced on February 28, 2022. At the sentencing, Mr. Aning will ask the Court to consider the factors listed in 18 U.S.C. § 3553 (a), and then impose a non-custodial sentence that is consistent with *United States v. Booker*, 543 U.S. 220 (2005).

Because Mr. Aning has never previously offended, he is in Criminal History Category I. The appropriate adjusted offense level for this offense is Level 24, which produces an advisory Guidelines sentencing range of 51 months to 63 months.

As set forth more fully below, the nature and circumstances of the offense and history and characteristics of the Defendant are significant. Prior to committing this offense, Mr. Aning worked tirelessly in the United States to support his family. While attending college, and supporting his family, Mr. Aning was approached by his coconspirators and offered money in exchange for periodic use of his bank accounts. More specifically, Mr. Aning permitted his coconspirators to deposit money into his accounts and then he distributed the funds at their direction. Initially, he was unaware that the funds were the product of fraudulent conduct. He later learned yet continued to engage in the conspiracy.

Mr. Aning received only a small portion of the funds that were transferred into his account. His financial statements, documented in the PSR, confirm that Mr. Aning did not live a lavish lifestyle. Indeed, any money he did receive was used to pay for everyday expenses, such

as his school, books, and other debt. (PSR at ¶ 77).

Mr. Aning deeply regrets his decision to participate in this offense. Shortly after being charged with this offense, he accepted responsibility for his criminal conduct and cooperated with the Government in his prosecution. Because he is a legal permanent resident of the United States, he will be removed from the country – and from his mother and sisters – following his sentence.

Mr. Aning has been on pretrial release since March 29, 2021 and has been compliant with all conditions of release. Sentencing Mr. Aning—a 30-year-old man with no criminal history—to a non-custodial sentence that is commensurate with his otherwise law-abiding life would be sufficient but not greater than necessary to accomplish the goals of sentencing.

I. SENTENCING PROCEDURE

Sentencing courts must “consider the widest possible breadth of information about a defendant” to ensure individualized sentencing. *Pepper v. United States*, 562 U.S. 476, 131 S. Ct. 1229, 179 L. Ed.2d 196 (2011). The Second Circuit has directed the Court to conduct a three-step inquiry when imposing a sentence: (1) calculation of the Guidelines range, (2) ruling on any motions for departures, and (3) determination of the § 3553(a) factors. *United States v. Crosby*, 397 F.3d 103 (2d. Cir. 2005). While a sentencing court must take the Guidelines into account, it may not presume that the Guidelines are reasonable, and must give careful attention to the factors contained in § 3553(a). *Gall v. United States*, 552 U.S. 38, 50 (2007); *Nelson v. United States*, 555 U.S. 350, 352 (2009).

As noted above, the Court's statutory mandate is to impose the lowest sentence that serves the purposes of sentencing - not to choose among multiple "reasonable" sentences. 18 U.S.C. §3553(a) ("parsimony provision"); *Rita v. United States*, 551 U.S. 338, 354 (2007).

Moreover, a sentencing court may not treat a Guidelines sentence as inherently superior to a non-Guidelines sentence. *See Nelson v. United States*, 555 U.S. 350, 351 (2009) (“The Guidelines are not only *not mandatory* on sentencing courts; they are not to be *presumed* reasonable.”) (emphasis in original); *Gall v. United States*, 552 U.S. 38, 50 (2007). The Court may even vary from the Guidelines range simply because it disagrees with it on policy grounds. *Spears v. United States*, 555 U.S. 261, 264 (2009).

1. GUIDELINES CALCULATION

In this case, Mr. Aning, the Government and U.S. Probation Office are in agreement that the correct guidelines range is level 24. Accordingly, Mr. Aning does not expect the Court to have to rule on any contested guidelines issues.

2. DEPARTURE MOTIONS

Once the sentencing court calculates the Guidelines range, it must consider and rule on any departure motions. Mr. Aning does not expect the Court to rule on any departure motions. He respectfully requests, however, that the Court take into consideration the factors set forth at 18 U.S.C. § 3553(a), as set forth below, and sentence him to the minimum sentence as required by law.

3. THIS COURT SHOULD IMPOSE THE MINIMUM SENTENCE REQUIRED BY LAW, EXERCISING THE DISCRETION RECOGNIZED BY THE SUPREME COURT IN *GALL V. UNITED STATES* and 18 U.S.C. § 3553 (a).

Justice Anthony Kennedy has stated that, “our resources are misspent, our punishments too severe, our sentences too long.”¹ It is incumbent on this Court to “consider every convicted person

¹ Justice Anthony Kennedy, Speech at the American Bar Association Annual Meeting (August 9, 2003).

as an individual and every case as a unique study in the human failings that sometimes mitigate, sometimes magnify, the crime and the punishment to ensue.” *Gall v. United States*, 552 U.S. 38, 51(2007) (quoting *Koon v. United States*, 518 U.S. 81, 113 (1996)).

Pursuant to 18 U.S.C. § 3553(a) and *United States v. Booker*, 543 U.S. 220 (2005), this Court must impose a sentence “sufficient, but not greater than necessary,” to achieve the objectives of sentencing, specifically with regard to the factors set forth at § 3553(a). This obligation, known as the “parsimony clause,” applies at every federal sentencing “except as otherwise specifically provided.” 18 U.S.C. § 3551(a). Indeed, the command of the parsimony clause defines the Court’s “overarching duty.” *Pepper v. United States*, 131 S.Ct. 1229, 1243 (2011).

The Supreme Court has restored to the District Court sentencing discretion that the mandatory sentencing guidelines had removed when the Guidelines were enacted more than twenty years ago. In *Gall v. United States*, 552 U.S. 38 (2007), the Supreme Court set forth the appropriate sentencing procedure:

[A] district court should begin all sentencing proceedings by correctly calculating the applicable Guidelines range. . . . [A]fter giving both parties an opportunity to argue for whatever sentence they deem appropriate, the district judge should then consider all of the §3553(a) factors to determine whether they support the sentence requested by a party. *Id.*, at 48.

...

[A] district judge must give serious consideration to the extent of any departure from the Guidelines and must explain his conclusion that an unusually lenient or an unusually harsh sentence is appropriate in a particular case with sufficient justifications. . . . We reject, however, an appellate rule that requires “extraordinary” circumstances to justify a sentence outside the guidelines range. *Id.*, at 46-47.

...

He must make an individualized assessment based on the facts presented. If he decides that an outside-Guidelines sentence is

warranted, he must consider the extent of the deviation and ensure that the justification is sufficiently compelling to support the degree of the variance. We find it uncontroversial that a major departure should be supported by a more significant justification than a minor one. After settling on the appropriate sentence, he must adequately explain the chosen sentence to allow for meaningful appellate review and to promote the perception of fair sentencing. *Id.*, at 50.

In a case decided the same day as *Gall*, the Supreme Court neatly summarized the new, diminished role of the Guidelines in the sentencing process:

We have accordingly recognized that, in the ordinary case, the Commission’s recommendation of a sentencing range will “reflect a rough approximation of sentences that might achieve § (a)’s objectives.” *Rita*, 551 U.S., ---, 127 S. Ct., at 2465. The sentencing judge, on the other hand, has “greater familiarity with... the individual case and the individual defendant before him than the Commission or the appeals court.” *Id.*, at ---, 127 S. Ct. at 2469. He is therefore “in a superior position to find facts and judge their import under §3353(a)” in each particular case. *Gall, ante*, ---U.S., at ---13, 128 S. Ct.586, 600 (internal quotation marks omitted).

Kimbrough v. United States, 552 U.S. 85 (2007).

In 2009, the Court reasserted the authority of the sentencing judge to vary from the advisory Guidelines range: “The Sentencing Guidelines are not only not mandatory on sentencing courts; they are also not to be presumed reasonable.” *Nelson v. United States*, 555 U.S. 350, 351 (2009) (emphasis added).

Finally, in a 2009 per curiam summary reversal, the Supreme Court held that “district courts are entitled to reject and vary categorically from the...Guidelines based on a policy disagreement with those Guidelines.” *Spears v. United States*, 555 U.S. 261, 264 (2009). If nothing else, *Spears* affirms the Supreme Court’s trend towards returning sentencing discretion to the district judge by authorizing a district judge to disregard the sentencing Guidelines based on a policy disagreement.

Among the factors to be considered under § 3553(a) are (1) the nature and circumstances

of the offense, (2) the history and characteristics of the defendant, and (3) “the need for the sentence imposed—(A) to reflect the seriousness of the offense, to promote respect for the law, and to provide just punishment for the offense; (B) to afford adequate deterrence to criminal conduct; [and] (C) to protect the public from future crimes of the defendant.” 18 U.S.C. § 3553(a).

i) The nature and circumstances of the offense and the history and characteristics of the defendant [§ 3553(a)(1)]

Lord Aning is a 30-year-old man, who has lived a law-abiding life, until he committed the offense for which he has pleaded guilty and accepted responsibility. He was born in Kumesi, Ghana in 1992 to Akosua Narkose and Joseph Aning. He has three siblings: Diamond Aning (8); Ashley Aning (18); and Lordia Aning (31). Mr. Aning shares a particularly close bond with his older sister, Lordia. Sadly, Mr. Aning’s father was not involved in his life, and he has little contact with him. Upon his mother’s departure for the United States, Mr. Aning was raised in Ghana by his maternal grandparents.

In 2014, at age 21, Mr. Aning immigrated to the United States to reunite with his mother and became a permanent legal resident. He described his arrival in the United States as “the happiest day of [his] entire life to have the opportunity to hug [his] mom again.” (See Exhibit A, Lord Aning Letter). Initially, Mr. Aning resided with his mother in Newark, New Jersey. While in Newark, he earned 48.50 college credits at Essex County Community College while maintaining gainful employment. In 2018, Mr. Aning relocated to northern Virginia where he continued pursuing his degree at Northern Virginia Community College.

On a more personal level, those who know Mr. Aning describe him as a selfless and caring man, who “always puts other people’s needs first[.]” (See Exhibit B, Nicole Haynes Letter). Mr. Aning’s friend, Prince Acheampong, writes:

One of the main reasons why we form a great friendship is because

of the qualities he possesses. His courage and selflessness always inspired me to raise my voice against injustice as he always stood up to bullies. . . . Above all I feel the quality that appeals to me the most is his compassion. Whether it's towards humans or animals, he's with the same energy.

(See Exhibit C, Prince Acheampong Letter)

Even as a young man, Mr. Aning was known for performing selfless acts; his sister, Lordia Aning, explains that he was “always coming home with people he me[t] outside of home who need[ed] help.” (See Exhibit D, Lordia Aning Letter). In fact, Mr. Aning’s friend, Kwame Owusu Antwi, says their friendship began in high school when, after his shoes were stolen, Mr. Aning gave him a new pair and never asked for anything in return. Mr. Aning then went on to tutor Kwame after he lost his mother. (See Exhibit E, Kwame Owusu Antwi Letter).

Mr. Aning has gone above and beyond to help others, even after his arrest. Nicole Haynes explains that, in addition to taking her in after her grandmother passed away, Mr. Aning reached out to another friend to help her secure a spot in culinary school. (See Exhibit B, Nicole Haynes Letter). Hillary Acheampong, Mr. Aning’s cousin, says he supported her with her undergraduate tuition fees and gives clothing to her brothers. (See Exhibit F, Hillary Acheampong Letter). Akosua Markose, Mr. Aning’s mother, says there have been numerous occasions where he has helped her—from organizing her things to waiting with a tow truck when her car broke down—or assisted neighbors, including by plowing snow for them. (See Exhibit G, Akosua Markose Letter). Lordia Aning shares that she was offered a job by a man who was willing to help her because Mr. Aning had previously helped his wife and kids when they were nearly stranded while on vacation in the United States. (See Exhibit D, Lordia Aning Letter). Prince Acheampong also recalls many times where Mr. Aning donated food, clothing, and money—even when it was all the money he had—to the less privileged. (See Exhibit C, Prince Acheampong Letter).

Even Mr. Aning's ex-girlfriend, Akosua Addo, says he is "one of the best people" she has met and he is "one person [she] just couldn't find faults with" despite their relationship ending. (See Exhibit H, Akosua Addo Letter). Akosua explains that Mr. Aning often helped her with schoolwork and did what he could to help her family, too. Akosua's mom even calls Mr. Aning her son. (See Exhibit H, Akosua Addo Letter). Hillary Acheampong aptly summarizes the feelings of his friends and family alike: "He makes me the best version of myself because he affects everybody. Lord impacts and makes the best team and everybody wants to be like him." (See Exhibit F, Hillary Acheampong Letter). Similarly, Mr. Aning's mother, Ms. Markose, says she is "so proud that even though [she] missed the best parts of his life, [her] son ha[s] grown into such an amazing and helpful young man[.]" as evidenced by the fact that her neighbors continue to ask about him, even after his move to Virginia. (See Exhibit G, Akosua Markose Letter).

Consistent with his selfless nature, Mr. Aning hoped that he would be able to provide a better a life for himself and his family. Following his arrest, however, Mr. Aning suffers great shame and remorse for his actions. He writes:

I wanted to be the best man for my mother and sister, but I am being their worst nightmare. I only wanted to be the father my sister couldn't have, the brother that she lighted up always seeing and the son my mom will be super proud of.

(See Exhibit A, Lord Aning Letter).

Friends and family—who were surprised to learn of his involvement, given his helpful and caring nature—have also expressed concern about the toll that his involvement has taken on his mental health. Kwame Owusu Antwi, explains that he has "withdraw[n] from his social life" (See Exhibit E, Kwame Owusu Antwi Letter) see also, (See Exhibit C, Prince Acheampong Letter) ("He's become emotionally traumatized and would not open up to friends and family who care for him.")

As set forth more fully above, Mr. Aning never intended to become involved in a large-scale wire fraud conspiracy. While attending college, and supporting his family, he was approached by his coconspirators and offered money in exchange for periodic use of his bank accounts. More specifically, Mr. Aning permitted his coconspirators to deposit money into his accounts and then he distributed the funds at their direction. Initially, he was unaware that the funds were the product of fraudulent conduct. He later learned, yet continued to engage in the conspiracy. Mr. Aning only ever received a small portion of the funds that were transferred into his account and his financial statements, documented in the PSR, confirm that he did not live a lavish lifestyle.

Mr. Aning's arrest and prosecution will have long-lasting effects on his life and his family's. He deals with the consequences of his actions on a daily basis. Despite his involvement in this offense, however, Mr. Aning has demonstrated recognition and affirmative acceptance of his personal responsibility and he has cooperated with the Government in this prosecution.

ii) The need for the sentence imposed to reflect the seriousness of the offense, to promote respect for the law, and to provide just punishment for the offense [§ 3553(a)(2)(A)];

Mr. Aning has no prior convictions resulting in zero criminal history points. Courts have found that “the length of time a person refrains from the commission of crimes, which is invariably tied to a person’s age, is a factor that is critical to a court’s determination of the sentence it should impose.” *United States v. Ward*, 814 F.Supp. 23, 24 (E.D. Va. 1993) (the 49-year-old defendant justifiably received a guidelines downward departure after the sentencing court determined that he had led a life otherwise void of criminal convictions). “The positive correlation between age and recidivism is impossible to deny[.]” and it has been observed that “[r]ecidivism rates decline consistently as age increases.” *United States v. Nellum*, 2005 WL 300073, at *3 (N.D. Ind. Feb. 3,

2005) quoting Federal Sentencing Guidelines, at 121; see also *United States v. Green*, 2007 WL 869725, at *2 (S.D. Ohio Mar. 20, 2007).

Statistically, a 30-year-old, first time offender, in criminal history category 1, such as Mr. Aning, has only a 13.3% likelihood of recidivism. See *U.S.S.C., Measuring Recidivism: The Criminal History Computation of the Federal Sentencing Guidelines*, at 28. Realistically, however, the true likelihood of recidivism here is as close to 0% as possible. In any event, given the circumstances of the arrest and his imminent removal, there is no chance that he will engage in similar conduct again. For these reasons, among others, the Court should sentence Mr. Aning to a non-custodial sentence.

iii) The need for the sentence imposed to afford adequate deterrence to criminal conduct [§ 3553(a)(2)(B)];

Recent studies have shown that there is no difference between probation and imprisonment in deterrent effect. See e.g. *Nat'l Research Council, The Growth of Incarceration in the United States: Exploring Causes and Consequences* 134-40, 337 (2014) (concluding that because the marginal deterrent effect of long sentences, if any, is so small and so far outweighed by the increased costs of incarceration, long sentences are “not an effective deterrent”); Daniel S. Nagin, *Deterrence in the Twenty-First Century: A Review of the Evidence* (2013); Frances T. Cullen et al. *Prisons Do Not Reduce Recidivism: The High Cost of Ignoring Science*, *Prison Journal* 91: 48S (2011).

Other studies have found that, while specific and general deterrence are components of most sentences, “increases in severity of punishments do not yield significant (if any) marginal deterrent effects.” Michael Tonry, *Purposes and Functions of Sentencing*, 34 *Crime & Just.* 1, 28 (2006). “Three National Academy of Science panels . . . reached that conclusion, as has every major survey of the evidence.” *Id.*; see also Zvi D. Gabbay, *Exploring the Limits of the Restorative*

Justice Paradigm: Restorative Justice and White Collar Crime, 8 Cardozo J. Conflict Resol. 421, 447- 48 (2007) (“[C]ertainty of punishment is empirically known to be a far better deterrent than its severity.”).

iv) The need for the sentence imposed to protect the public from further crimes of the defendant [§ 3553(a)(2)(C)]; and

At 30 years old, having only committed the instant, non-violent offense in his entire life, there is certainly no need to impose an extended sentence of confinement to protect the public from any future crimes of Mr. Aning. He has shown full remorse for his conduct, has cooperated fully in both his own prosecution, and will be removed permanently from the United States. He is not at risk of becoming involved in this type of criminal activity again.

v) The need for the sentence imposed to provide the defendant with needed educational or vocational training, medical care, or other correctional treatment in the most effective manner [§ 3553(a)(2)(D)];

Mr. Aning is not in need of any educational or vocational training, nor of any correctional treatment. Furthermore, due to his immigration status, Mr. Aning would not be able to earn time by participating in certain programs, and he would not be eligible for any furlough. Furthermore, Mr. Aning’s immigration status likely means that he would be ineligible for a halfway house or home confinement towards the end of his sentence.

vi) The need to avoid unwarranted sentence disparities among defendants with similar records who have been found guilty of similar conduct [§ 3553(a)(6)];

Mr. Aning should receive a sentence that is consistent with sentences imposed in other fraud cases. The Second Circuit has repeatedly acknowledged that a sentencing court should avoid unwanted sentencing disparities. *See United States v. Brennan*, 395 F.3d 59, 69 (2d Cir. 2005); *United States v. Dorvee*, 616 F.3d 174, 182-83 (2d Cir. 2010); *United States v. Cavera*, 550 F.3d 180, 188-89 (2d Cir. 2008).

In 2020, the mean sentence of imprisonment for offenders with a criminal history category of I, like Mr. Aning, who were convicted of fraud/theft/embezzlement was 16 months; the median was 6 months. (See 2020 Annual Report and Sourcebook, <https://www.ussc.gov/sites/default/files/pdf/research-and-publications/annual-reports-and-sourcebooks/2020/2020-Annual-Report-and-Sourcebook.pdf>, at p. 87). For offenders in that same category, the mean length of imprisonment was 22 months; the median was 12 months. (*Id.*, Table 28). The same year, the need to avoid unwanted sentencing disparity was cited as at least one reason for a downward departure or variance a total of 3,999 times for offenders convicted of fraud/theft/embezzlement. (*Id.*, Tables 43 and 44). These sentences are significantly shorter than the 51 to 63-month sentence recommended for Mr. Aning by the guidelines.

Further, given Mr. Aning's status as a non-citizen, any prison sentence he receives will be more restrictive and in harsher conditions than a similarly situated U.S. citizen. Typically, as a first-time, non-violent offender, Mr. Aning would be assigned to a "minimum security" facility—the least restrictive within the BOP—if he were a United States citizen. However, as a non-citizen, Mr. Aning would be classified as a "Deportable Alien" and thus, any sentence of incarceration imposed on him would likely be served at a private, for-profit prison in harsher, more restrictive conditions. In the 2016 report "Review of the Federal Bureau of Prisons' Monitoring of Contract Prisons" by the Office of the Inspector General ("OIG"), it was concluded that "in most key areas, contract prisons incurred more safety and security incidents per capita than comparable BOP institutions[.]" (Review of the Federal Bureau of Prisons' Monitoring of Contract Prisons, Office of the Inspector General, August 2016).

The harsh conditions Mr. Aning will face while incarcerated are likely to be compounded by the location of his designated facility. Non-citizens, like Mr. Aning are exempt from the general BOP rule to place prisoners within 500 miles of their release residence, where they have the

support of their community and family. A designation at a facility further away from his family's Newark residence would make it more difficult, if not impossible for his family and friends to visit.

In addition, a similarly situated U.S. citizen would typically be eligible for early release programs, such as home confinement or a halfway house. Due to his immigration status, Mr. Aning is ineligible for these early release programs. Thus, any term of incarceration served by Mr. Aning would be functionally longer.

The harsher sentences faced by non-citizens was noted by Chief Judge McMahon in *United States v. Connolly*, 16-cr-370 (S.D.N.Y. Oct. 24, 2019). Following a conviction for conspiracy to commit wire fraud and bank fraud, defendant Gavin Black was facing a substantial term of incarceration. In sentencing Black to three years' probation plus nine months of home confinement to be served in the United Kingdom—Black's home country—Chief Judge McMahon explained:

If I could sentence Mr. Black to a term of incarceration—a brief term of incarceration—knowing that he would go to a facility appropriate to his criminal conduct, I would do it. But I know that I can't. I know that simply because he is a non[-]citizen—and I use that term advisedly, he is not an illegal alien—[b]ut because he is a non-citizen, he will not be eligible to serve his sentence in the same way that any American citizen who stood convicted of this crime would serve. And that's not right... -- for reasons I cannot comprehend, at the end of that term he could not walk out the door and be picked up by [his attorney] and taken to the airport. He would be treated like an illegal alien, and he would be released into the custody of ICE, and at some point long after my intended sentence had expired he would be deported. And that's not right. ... I can't bring myself to impose a sentence of incarceration in the United States for Mr. Black.

(*See Connolly*, [Dkt. 457] Sent. Tr. (Nov. 19, 2019) at 91:8-92:13)

Similarly, Mr. Aning would serve unnecessary, additional time incarcerated in an immigration facility until he is removed from the United States. The conditions Mr. Aning will

face within the immigration facility are likely to be inadequate and thereby exacerbate the resulting disparity. In the 2019 OIG report “Concerns about ICE Detainee Treatment and Care at Four Detention Facilities,” several concerns were noted, including nooses in cells, expired food, overly restrictive segregation, dilapidated and moldy bathrooms, and inadequate clothing and hygiene items. (Concerns about ICE Detainee Treatment and Care at Four Detention Facilities, Office of the Inspector General, June 2019). Noting “the ICE problem and the camp problem,” in *United States v. Millul*, 18-cr-579 (S.D.N.Y.) (Rakoff, J), [Dkt. 156], Your Honor granted a variance for defendant Millul, a French citizen.

In sum, due to his immigration status, Mr. Aning will serve a longer sentence and in harsher conditions than U.S. citizens who commit the same offense.

IV. LETTERS

Mr. Aning will be prepared to address Your Honor at sentencing and has prepared a letter to the Court attached as Exhibit A. Additionally, in support of Mr. Aning, attached are letters addressed to Your Honor:

- Exhibit B Nicole Hayes Letter
- Exhibit C Prince Acheampong Letter
- Exhibit D Lordia Aning Letter
- Exhibit E Kwame Owusu Antwi Letter
- Exhibit F Hillary Acheampong Letter
- Exhibit G Akosua Markose Letter
- Exhibit H Akosua Addo Letter

V. JUDGMENT OF CONVICTION REQUESTS

Recognizing that the Court does have the discretion to impose a sentence of incarceration and in the event that the Court decides to impose a sentence of imprisonment, Mr. Aning respectfully requests that this Court make a written recommendation in the Judgment of Conviction as follows:

“The Court recommends to the Bureau of Prisons that Defendant Lord Aning be placed at a facility nearest Newark, New Jersey.”

See Woodwall v. Federal Bureau of Prisons, 432 F.3d 235, 251 (3d Cir. 2005) (“the BOP should consider the sentencing judge’s recommendation and the other § 3621 factors the BOP routinely considers”).

Mr. Aning would receive a more favorable designation by the Bureau of Prisons if he is permitted to self-surrender. We respectfully request that the Court permit him to do so.

CONCLUSION

For the reasons explained above, we respectfully request the Court impose a non-custodial sentence that is sufficient but not greater than necessary.

Respectfully submitted,

/s/ Ernesto Cerimele

Ernesto Cerimele

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Dated: February 21, 2022

EXHIBIT A

Dear Judge Rakoff,

I grew up in an extended family household with my grandmother and her sister and their families, consisting of about forty people. It was a lot of fun and competitive because there were about four other kids my age and a lot of my relatives in my age group. We played all day and still competed each other with our homework and other sporting activities to choose a winner. The goal was always to win and be made the champion of all. My grandma was a trader who had to travel all around the country and sometimes to neighboring countries to find items to sell and make food available for us. Her sister on the other hand was a farmer who every now and then we go to help harvest food stuffs to sell for upkeep she was a maize farmer. When we get home from the farms which was about ten miles in and out every day the number of corn cobs, we each had will be cleaned and boiled mostly for sale by ourselves. How much sale you make will determine what food you can get to eat.

Amongst others was some of the things we had to do in our childhood to survive in my home and vicinity. My mother who at that time used to trek with my grandmother had to take over travelling to get items to sell when my grandma fell ill due to ulcers of the stomach. I wasn't seeing her much already due to their jobs and the little time had been taken away. There were days that I'll wait for her with my sister to have her feed us or want to be with her but as we grew up it got harder. I had only my sister to look up to for most assurance that mom will be home soon which only happened after late in the night and she having to back to work very early in the morning.

Little did I know that my mom's strife was because my dad whom I had never seen in my life at age eight and who I looked up to and despite not knowing him, with stories from mum about and my other family members who will whisper when you pass about how much I took after him had left us. To where, is still a mystery I have not been able to unravel.

I was very close to my grandpa who will call me to clean his shoes and give me some portion of his food and tell me stories about him growing up and how fast the world was changing. He will tell me a lot of stories about my country and how he wanted me to be a footballer. My grandpa was my console, my fortress. He was the one person I could always run to and tell everything that happened in my day at school or during hawking or anything else that someone had done wrongly. My grandfather passed away following a short terminal ill which left my whole family especially my grandma very broken. It saddens my heart to recap all this past life. Eventually, my grandma became very tormented and my mom being business minded like her mom and because my dad had left her took over her business and then one trip she didn't return, and my sister and I were told she had come to seek greener pastures in the United States of America to be able to cater for our rather large family and her two kids.

Years passed and every growing child's dream of leaving a comfortable life with their parents didn't happen to me or my sister even though we continued living with my, grandma and every now and then due to her busy schedule had to move from one family members house to the other. This was very difficult for me because every household came with different rules and different ways of living. My sister always did her best to make sure I was satisfied with every bit of my life, so I didn't have to be sad. She will sometimes give her food or even her lunch money to make sure I had enough to be full. In our grownup ages, she moved to a different region to further her education through high school and tertiary education. I was sent to the boarding house

during high school because my sister was away, and my grandmother was busy. My other aunts and uncles were there but had their families to take care of.

My sister will visit me every other month or two to make sure I was okay. We will write letters to my mom, and she will send us cards occasionally which made me so happy all the time because seeing her writing on the card made me feel close to her. With hard work and some strife, I was able to successfully complete high school and got admission to the university. In my third year I was able to finally join my mother in the United States. It was the happiest day of my entire life to have the opportunity to hug my mom again.

I settled in and after some months started working. I was very eager to do all I could within my strength to ease my mom's stress because she had to work all shifts to keep up with the bills here and cater for our family back at home. I worked hard to support. I decided after coming to this country and realizing my mother's way of life that I had to be the man of the family that my father had sadly broken without taking a look back. My mother needed a break. My sister needed support financially and so with my cousins, uncles and aunts we had left back home.

With the intention of being the man of the house my plan was to move out and be able to work extra shifts because my mother was too worried about me staying out late or working a second job because she did not want to lose her son a second time. I finally moved out of the house a few months to my sister coming to this country so I could be able to be a man by working harder and be able to move my family to a better apartment and get my mom to retire.

Sadly, I ended up with the wrong direction and learned a lot of things which I am very ashamed of and makes me feel how much of a disappointment I have brought to myself, my mom and my sister who sees her hero in me. They try everyday to make me believe there's more to life than the trouble I have caused but I see a loser in myself. I wanted to do be the best man for my mother and sister, but I am being their worst nightmare. I only wanted to be the father my sister couldn't have, the brother that she lighted up always seeing and the son my mom will be super proud of.

Starting a life on my own and knowing how much worried my sister and mom can get due to their womanly instincts I decided to relocate to a different state in order not to feel too close to home and lose sight of my goal. I moved to Virginia and to start my life with school and a new job. I knew a few friends out there which made it easy to fit in and due to my growing up with a very large family it was easy for me to relate to everyone. I helped when I was asked and when I could give a hand I was always willing and available for my new family. I do this because my grandma thought us to share and be kind no matter how little because it goes a long way to make someone's life easier.

Little did I know that in this big world there are a lot of people who will always take our kindness for granted. I kept on doing the good I know even with the advice of my mother, sister and a few friends telling me to watch my back always. I kept being the free-spirited person I am until one morning I woke up to my arrest. I was struck with shame, confused and totally petrified.

I realized how I had failed, disappointed, and crushed my mother, my sister all the neighbors, colleagues and myself instantly. I fear to step out now because I see eyes roll and

whispers bypass me when I walk past the old people that once asked me for help. I have become an outcast in my neighborhood. It appears anything I get close to will be contaminated or destructed. I avoid all eye contacts because I am afraid of the looks I will see in eyes around me. Sometimes I stay in my room with suicidal thoughts because I feel like it's the only way to make my life easy now. I feel very ashamed to face the world.

My mom always wanted to see me as corporate worker in a suit and tie, my sisters face glowing when she sees me and how my aunts and my cousins and nephews and nieces look up to me as a mentor and how my friends resort to me for advice, flashed in my face and I wonder how I am ever going to explain myself to them. I live in fear, trauma, and loss that nothing can ever be the same again. I let negative influence get to my head so bad and took over my life that I lost sight of what reality is. I have caused pain, loss, distrust to individuals and families I have never being in contact with, to those that look up to be for hope and all the people that I helped out of my goodwill who tell me I make them believe there's some good still out there. My negative actions have led to my living and shame and regret and fear that nothing will ever be the same again no matter how I try to make things right. I know I deserve to pay for my actions through the necessary punishment, but I am wholly devastated and horrified.

I humbly and truthfully ask remorsefully, with all apologies that, the United States legal systems, the individuals, families and homes, your jury, my family, friends, colleagues and neighbors I have caused hurt, pain and loss, disappointment, shame and dishonesty, if I can be given a chance to make up for my errors. If you'll be merciful in deciding what punishment I should receive, I plead a chance to correct all the wrongs I have done with all that it is going to take me to and build my life again with all the experience I have gained in this challenging times.

Respectfully Yours,

Lord Aning

EXHIBIT B

Honorable Jed S. Rakoff, U.S.D.J.

Daniel Patrick Moynihan United States Courthouse

500 Pearl St.

New York, NY 10007

Re: United States v. Lord Aning

1:21 CR 88

Dear Judge Rakoff,

My name is Nicole, a sister to Lord Aning. We lived in the same house for couple of years. I met his family through his sister Lordia, whom I attended the same senior high school with. They took me in wholly as part of their family and when my grandmother who was my everything passed on a year after we completed high school. They say, 'there's a friend that sticks closer than a brother', and that is, Lord and his family.

Lord Aning is a friend to all. He always puts other people's needs first and he's always willing to help. Lord has always been there for me and I remember that time he made us go help out at a community center, I really got tired and overwhelmed. He teased me all through and bought cake for me on our way home. I really felt fulfilled and I had an understanding of how he lived. He is always willing to lend a hand with everything.

Honestly, I don't think I would have gotten through culinary school without him getting in touch with a friend to secure a slot for me when admissions had almost closed. He's extremely selfless and dependable.

Lord and I understand the severity of the crime and it's tough for us all. There's not a single day his sister and mother together with him and other family members don't wish we can undo what has been done. I see how his sister is very reserved lately, his mom being lost in thoughts and crying always. I see all hope lost for this amazing family and I cannot help it because they go out of their way for everybody without a flinch. Please give Lord a chance for his family to not fall apart. If ever anybody deserves another shot at anything at all in this life, I believe out of the goodwill of only Lord, he will be pardoned.

Lord has reflected on his actions and he is incredibly remorseful for what he has done and I know he deserves a second chance to keep lending a hand to other family members just as he did for me. I plea for him to a chance for us to make right his mistake.

Thank you,

Respectfully,

Nicole Haynes.

EXHIBIT C

Honorable Jed S. Rakoff, U.S.D.J.

Daniel Patrick Moynihan United States Courthouse

500 Pearl St.

New York, NY 10007

Re: United States v. Lord Aning

1:21 CR 88

Your Honor,

Friendship is one of the greatest blessings that not everyone is lucky enough to have. We meet lot of people in the journey of life but there are only a few who leave a mark on us. Lordia and Lord Aning are my friends I met in school but high school and university respectively in Ghana and they leave the best marks on you. They are angels, thus, their names.

They make so much positive impacts in lives we forget they are not twins. We have been friends for about fourteen years and our friendship remains unscathed. Most importantly, I feel extremely fortunate to have Lord Aning as a friend in my life. One of the main reasons why we form a great friendship is because of the qualities he possesses. His courage and selflessness always inspired me to raise my voice against injustice as he always stood up to bullies. He is also one of the most intelligent people in my circle. Above all I feel the quality that appeals to me the most is his compassion. Whether it's towards humans or animals, he's with the same energy. I remember one time he gave his money to a seller on the street and that was everything he had on him. Similarly, he did a lot of help with school mates when were in school. He mostly donated food items and his clothing to the less privileged even on no occasion days. He equally was helping one of our friends who lost his parents. That incident made me respect him even more and inspired me to help the underprivileged more often. The bond I share with him is one of my most prized possessions.

His arrest came to us as a hit and astonishing. Could have even been Lordia and it will not be any news but Lord, never possible. Lord, whom I know to be very open minded has sought solitude from the world which is very disturbing. He's become that introvert and is keeping stuff to himself always. He's become emotionally traumatized and would not open up to friends and family who care for him. The sadness in his voice whenever he speaks on phone is discouraging and heartbreaking.

He's really not been himself ever since his arrest. I am very willing to always support Lord because a heart like his will never let evil prevail. I've never known him to be a bad person which I can have a whole community testify to. He always put up an excellent personality and I trust Lord Aning very much.

Your honor, they say, I believe a person like Lord should be given a chance to rewrite the past months of his life. Notwithstanding, his being a good person, he loves to help people and he

is always there for everybody even when it is beyond him. His personality is so outstanding he has a lot of people that look up to him.

I respectfully ask that your esteemed jury will pardon Lord with a chance to a better lifestyle and ease himself and his family of the trauma they are going through.

Your Honor, in conclusion, I know decision making is tough most especially when you do not know the person, so please have faith in the person being tried here that he is an honest person and man with a strong sense of duty. He will make up for his mistakes and live a very fulfilling life henceforth. Thank you for considering my letter. Please let me know of any further help I can give.

Respectfully Yours,

Prince Acheampong

+233 26 649 1825.

EXHIBIT D

Honorable Jed S. Rakoff, U.S.D.J.

Daniel Patrick Moynihan United States Courthouse

500 Pearl St.

New York, NY 10007

Re: United States v. Lord Aning

1:21 CR 88

Dear Judge Rakoff,

I am writing on behalf of my younger brother, Lord Aning, whom I have shared my whole life with until the past eight years when he came to the United States. Despite that, we communicate as much as needed.

Lord is free spirited, humble, down to earth, kind to the bone and helpfully selfless and honest person of very few words which you may have witnessed during some of the court hearings. I must say he is part of my reasons for being able to go through my days with so much laughter. Growing up, he's always coming home with people he meets outside of home who need help.

Some of these reasons are because of his selfless acts, which let his friends and colleagues and even elderly people want to help me wherever I meet them. Fortunately, we have so much resemblance that we are mistaken for twins. I've had random people ask me across town if he's my brother and it is nothing new to me anymore. An incident is an instant where I had to do my internship and I had roamed a few companies in person and through applications in Ghana, but to no avail. A man I met at Nick TC Scan, where I worked for about five years before relocating to the United States walked past me and back to ask if I was related to Lord. I said yes, and he asked why I had to be in line. Well, I was a little bit confused for a minute before it dawned on me that he must have worked his 'magic' which I call it on him. He immediately reached out for my application and asked me to start the following month, after my three months of internship I was offered a job opportunity which kept me through survival till eventually I came here because job opportunities are to die for in my country. This was because Lord had helped his wife and kids when they had come for a vacation in the United States and his wife was almost stranded with a baby and two toddler kids.

This is just one of the few and since I cannot take all of your time, I will leave it there. We have woken up to days of our neighbors waiting in our compound because they need my brother to do one thing or the other for them. My cousins and some of his neighbors even are comfortable enough to leave their babies in his care because they enjoy him more than their parents and they know their kids are in safe hands.

My Lord, to tell the truth, if this predicament had befallen me, I am not sure half of the numerous calls I have been receiving in these past months will come through my mom's or my

brother's phone to find out if I really got arrested. I am the troublesome amongst the two of us that people assume he is the oldest. Nobody will really trust their kids with me all day without a call to check up on us. My brother is an angel.

Bad things they say really happen to good people and sometimes, people get themselves in the most underserving situations. I still can get over myself wondering how he got himself there, because I should be the one getting into trouble especially and him coming to my rescue, but here we are and we have to face the music.

Your Honor, to this day since the past year my mother nor I is able to watch any crime related shows or with prison or jails. It is very devastating and overwhelming. We haven't and cannot get over it. It is tragic to me. I shiver and feel very cold when I see handcuffs or think of jail terms, especially with Lord Aning. I am not sure if I was the one facing this, I will even feel this way.

The most difficult part is him being able to secure a job. it has come a long way to affect the family because we have to take care of all his bills and ours at the same time. I am in tears everyday because my mother is very depressed and my brother keeps withdrawing from us. I really don't want to lose my family. They are all I have in this world.

I request, humbly and with all due dignity, that Honorable Judge Rakoff, pls be lenient with my brother in deciding what punishment he receives and let him have a go to at doing right and living better than what he did.

I will like to say thank you for your time and please I am available for any questioning should you need me in the near future.

Respectfully,

Lordia Aning

165 Chancellor Ave, #5E

Newark, NJ, 07112

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EXHIBIT E

Honorable Jed S. Rakoff, U.S.D.J.

Daniel Patrick Moynihan United States Courthouse

500 Pearl St.

New York, NY 10007

Re: United States v. Lord Aning

1:21 CR 88

Dear Judge Rakoff,

Lord Aning is a friend who became the brother I never had, ever since our paths crossed. I met him in high school when we were about to have our first indoors games, I had my shoes stolen and him been the kind hearted person that he is gave fresh pair out of his locker and never asked for any favor in return.

In final year I had challenges with catching up with all lesson notes due to my losing my mother. Him been as compassionate he is, came to my aid again by engaging me after our regular class hours for me to catch up and talked to his grandmother for me to move in to live with them and with his zeal and free spirit. We both passed and went to the same university. Kwame as we all call him, talked to his mom to pay full hostel fees for us for our school years and also always brought along meals and even what I had to drink.

In my own words, I will describe him as kind, compassionate, selfless and a very honest man. I have been worried and heartbroken because Kwame has never been complete ever since his prosecution and my biggest fear is if he can really cope with his final verdict. He goes off in the middle of conversations and wants to be by himself most of the time which is unlike him. I talked with the family when he was arrested and they shared similar sentiments. Personally, I try to support him in all ways in these trying times. He is a brother I have had and I keep believing in all the principles that he taught me and makes him the gentleman he is. He is the kind of person that does not sit quietly and let bad things happen.

I strongly believe his selflessness led him on to do some good and has led him to this predicament. His withdrawal from his social life is my fear that his mental health may be affected. He is always the light in the group, making everyone laugh and smile but hardly is his conversations even enlightening now.

I humbly ask that Your Lordship, will kindly please give my brother chance to make right what he did wrong because I believe he has really regretted leading himself into this situation and will take every opportunity to prove that he is a better man. Thank you.

Respectfully Yours,

Kwame Owusu Antwi

EXHIBIT F

Honorable Jed S. Rakoff, U.S.D.J.

Daniel Patrick Moynihan United States Courthouse

500 Pearl St.

New York, NY 10007

Re: United States v. Lord Aning

1:21 CR 88

Honorable Judge Rakoff,

It's an honor to write you this letter, and I hope it finds you well. Lord Aning is my cousin, and I have known him for all my life. We lived together for the most part of our childhood. I was both disturbed and startled to hear about his recent case as he has always been a rather reserved person. It is for this reason I am delighted to write a letter of reference for Lord Aning concerning this issue. I know the seriousness of this case, nonetheless, hope your honorable court will show some clemency.

Lord Aning has always been an honest person in the neighborhood. He has always been there for us, especially in moments when I had nobody to turn to for help. He has always been supportive and reliable. His generosity and act of kindness is unparalleled. It was Lord Aning that supported me with my undergrad tuition fees and will give his clothing to my brothers. He really is my big brother, the one I know will take the world on for me. He makes me the best version of myself because he affects everybody. Lord impacts and makes the best team and everybody wants to be like him.

Lord Aning is not perfect and has had some shortcomings in his life. However, I firmly believe this unfortunate incident has happened to help him because he gives his best to even people that use him. All in all, Lord has showed deep sense of remorse in making such a serious mistake from how he is living in solitude and isolation now which I am very much afraid is taking a toll on him mentally and I strongly believe in his ability to pay his debt to society.

It is my genuine hope that Your Honor, takes this letter into consideration before any verdict is reached. Despite the current situation, I firmly believe Lord Aning, an honorable and trustworthy individual, a valuable member of our growth and above all, a very selfless person, deserves a chance to continue serving his community with his genuine love he gives us.

Thank you.

Respectfully,

Hillary Acheampong

921 Bergen Street

Newark, NJ, 07112

EXHIBIT G

Honorable Jed S. Rakoff, U.S.D.J.

Daniel Patrick Moynihan United States Courthouse

500 Pearl St.

New York, NY 10007

Re: United States v. Lord Aning

1:21 CR 88

Dear Judge Rakoff,

I am the mother of Lord Aning, I gave birth to him in the year 1992. In the year 1991, a couple of months prior to his birth, his dad migrated to the United States of America, leaving me to cater for him and his sister. In the year 1998, six years after his birth, I joined his father in the United States of America, leaving Lord and his sister in the care of my mother, junior sister and her husband. This affected his upbringing because his parents were physically absent in his early life even though I spoke to him occasionally through letters and eventually telephones.

In the year 2000, my relationship with my then husband, Lord's father, came to an end and we went separate ways. A decade after my divorce, my sister who was taking care of Lord and his sister also divorced her husband, forcing her to send Lord and his sister to live with their grandmother full time.

In the year 2010, after acquiring my permanent residential status, I filed for Lord and his sister to join me in the United States of America, but Lord was the first to receive his documentation to move in with me.

When he arrived, he started school and was studying to become a physical therapist. Aside schooling, he had a security job, he later worked at Amazon, then Perfumania, before joining Lyft as a driver. He is a calm and respectful young man living a normal accepted life, which made him likeable at all his workplace.

When Lord moved in to live with me in New Jersey, I was doing live-in as my job, but I noticed his association with some friends of his and I did not like it so I opted for a live-out so that I can spend time monitoring and correcting him. Two years after living with me, he decided to move to Virginia because his girlfriend lived there and, he wanted to school there. I objected to his idea, but he insisted and knowing he was no more a kid, agreed, so he moved to Virginia. Years later, his sister arrived in the US to live with me and so we visited him in Virginia at least twice to check on him. To us, he was living well because he was in school and was also working for Uber as a driver.

His attitude has always been right and respectful and kind to all, as I know him to be, so in my eyes, my son was living upright. He never disrespected me or his sister, and that is how I know him to be. Helpful to all including my friends and our neighbors. Everybody, all

nationalities in my apartment, ask of him from time to time even after his relocation. Little did I know that my son had gone way ward or had a different way of life.

We've had occasions which he has been so helpful right from volunteering to help us organize our stuffs to staying with tow trucks to get my car to rightful locations in stranded times and helping neighbors plough snow that, I feel so proud that even though I missed the best parts of his life, my son had grown into such an amazing and helpful young man.

I made sure to speak to him on phone every now and then to check on him until I got the news about his arrest in 2021. I was surprised and as devastated as anybody that knows him would be. It was very tormenting and heartbreaking but I held on with the hope that it might be a mistake and waited on him to fill me in on what happened. He admitted to the crime but with so much remorse and regret of not knowing the harm he was causing to others and even the repercussion he was bringing to himself. I believed him because Lord is the one of the kindest people I have known in my life, very selfless and so giving that Your Highness, I sometimes fear for his own good.

My son has done very wrongful to the nation and innocent individuals and my family and community as a whole. I feel so affected and ashamed that I have not been able to fulfill my motherly duties in these past few years he has been with me while I think of all the times that I was missing out on his childhood hoping I could be with him every moment of that whole transition. I have failed drastically as a mother.

I live in shame and fear that I cannot be of help to the younger generation because I could not even help mine that God gave me much more to help others. I believe that sometimes good people do things out of desperation but only if I can understand his reason for ending up in this situation or talked to me for help.

I humbly ask that your Jury will be merciful in choosing a punishment, to offer him a chance to make up for his wrongdoing and reconstruct himself into a productive member of the family, the society and the country as a whole.

I am willing to do everything in my means as a good and helping mother to see to that. Please count on my help and I am at your call if any help is needed. With all due respect, thank you for accepting my letter.

Yours Respectfully,

Akosua Markose
165 Chancellor Ave., Apt. 5E
Newark, New Jersey 07112

EXHIBIT H

Honorable Jed S. Rakoff, U.S.D.J.

Daniel Patrick Moynihan United States Courthouse

500 Pearl St.

New York, NY 10007

Re: United States v. Lord Aning

1:21 CR 88

Your Honor,

Lord Aning is my ex-boyfriend. I met Kwame as I always called him in high school and dated him through out to university level in Ghana.

Kwame (Lord Aning) is one of the best people I have met in life. I am actually emotional typing this because writing about him has brought back a lot of memories. Mostly when relationships go sour, you can't really say good things about your ex but Lord is one person I just couldn't find faults with. He had his own flaws but he seemed so perfect to me and almost everybody who knew him. I have moved past everything and actually with an amazing person as well but deep down I always knew I lost a real one.

Lord loved me wholeheartedly and did everything in his means to make me happy. He is selfless and a very generous person. He sacrificed so much for me and my family and anytime I needed something, he didn't hesitate giving me everything he had on him. My mum calls him her son and she worry more than I do about what has happened to him. She believes a good deed has ended him up in a wrong situation and nothing can make her think otherwise. His words always "As long as you alright baby" makes me happy. He helped me with my studies and assignments in school. He would stay up all night teaching me about a lesson I couldn't understand in class. He is calm, reserved, very intelligent person, honest and always want to do the right thing.

Lord has a very big heart and have so much love to everybody. Regardless his age, he did a lot of charity work. I remember he once helped a group of kids home with a sac they could not carry when we were very late for a program, I was so mad and he wasn't bothered knowing he was doing the right thing. Grownups will come to his house in the morning to ask for help even before day break because they know he will deliver. I respected him more with that act of kindness. He didn't mind giving everything on him to someone who needed it most and say, 'I'll go to my sister'. Lord provided more than enough to the needy anytime and anywhere I feared my future was in jeopardy because I may come home one day to see my home given up to someone else out of his goodness.

I see more of a true leader in Lord Aning because he protected me and made a better person out of me. We could talk for long hours on phone and mostly, he advising me to make

good choices in life. He encouraged and inspired me to achieve higher. Lord impacted on so many lives. He is one of the coolest kids in school and people do a lot for me in his name. My dad is a military man and his military rules is what we live by. Being the only daughter doesn't want men around me but every now and then he asks about Lord. I wonder sometimes how he got to him like that.

His trial has really had an emotional toll on him and even on myself. He's not himself and isolates himself from his family and friends. He's actually depressed. The last time I contacted him, it took me more than a week before I could get a reply from him and that's typically not who he is. His mum and sister are equally devastated.

In as much as I totally condemn his crime, I believe everybody deserves a second chance to right their wrongs and I will stand with him in any way I can because I know he's a good person. Sometimes, good people also make mistakes and those mistakes do not define them.

I am actually still surprised Lord got himself tied with a crime because I know this isn't the Lord I know. He is always against anything that has to do with cheating people, which is something I can never forget so it's kind of really surprising knowing he's got caught up in here. Without any doubt, this actually makes me feel, he was going through something that none of us has no idea of. Nevertheless, I still have so much faith in him and I believe he will do the right thing to make up for his acts. He has so many potentials in him that needs not to be wasted. I believe he has so much to offer the world and for that reason, I plead leniency for him. Thank you.

Respectfully Yours,

Akosua Addo
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