UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,
Plaintiff

v. Criminal File No. 00-00-0

Mr. B.,
Defendant.

CJA JUSTIFICATION STATEMENT

1. In the above-entitled matter, I represented Mr. B. That representation was pursuant to a CJA appointment, dated January 30, 2023 (ECF 14).

2. This statement is submitted because the total payment requested in the final submission for the appointment and representation of Mr. B in this case exceeds the statutory maximum amount provided in 18 U.S.C. § 3006A(d).

3. I believe that a payment in excess of the statutory maximum amount is justified in this matter. The discovery in this case was voluminous and needed to be properly dissected to develop legal strategies. I had to spend a great deal of time reviewing the evidence and, in turn, conferencing with my client to help him understand the evidence and how it impacted his case. Mr. B was, appropriately, very invested in his case and had numerous legal theories he wanted to pursue. In order to represent Mr. B properly, it was necessary to spend a lot of time listening to him, trying to understand the legal theories he wanted the defense to pursue, learning the facts of the case in great detail, and conducting legal research to help him understand that some of the legal

avenues he wanted the defense to take were inappropriate and, in many instances, not relevant to the facts of his case. Although some of the things listed above can be found in almost every case, Mr. B presented some unique challenges in this regard and was not a typical client given his significant mental health challenges. Attempting to develop a rapport with Mr. B and addressing his many concerns, I believe, was essential to the successful resolution of the case, resulted in my client having less severe consequences than if the case had gone to trial and resulted in the case resolving without hearings or a trial. On a couple of occasions, Mr. B presented me with a series of legal theories on his case that required me to respond with researching the law. I then needed to walk him through the case law for him to understand how his positions were not supported by the law and the facts. It is my belief that the time spent on this case was absolutely necessary to the outcome.

4. I first did work on this case on January 30, 2023, when I reviewed the initial file materials I received and performed legal research. The last work I did on the case was on November 2, 2023, when I spoke to my client, drafted a letter to my client, finalize a Notice of Appeal, and emailed with the Court.

5. This case was extended for the following reasons:

    a. The duration of the representation that encompassed over nine (9) months.

    b. The case involved voluminous readable and video discovery which needed to be reviewed in detail to adequately represent Mr. B.

c. The case required extensive client-attorney consultations by video and in person with Mr. B to make sure he understood the charges he was facing, the consequences of charges faced, and his likelihood of success at trial.

d. Additional time was required to discuss in detail and provide case law to Mr. B regarding the many legal issues in the case and why many positions he wanted the defense to take were simply not applicable in his case.

e. Mr. B's personal characteristics and significant mental health issues required additional time and attention, above and beyond what is typical for criminal defense/CJA clients.

f. In preparation for the Presentence Investigation Report (PSI Report) and drafting defendant's sentencing pleadings, it was necessary for counsel to spend a considerable amount of time speaking with Mr. B and his family to get a good understanding of sentencing factors, which, pursuant to 18 U.S.C. § 3553, need to be brought to the attention of the Court.

6. Accordingly, the undersigned submits that all the time and expenses outlined in the CJA voucher are appropriate under the circumstances considering the extended nature of the litigation, the personal history of the client, and the nature of the case.

7. If additional information is needed, I am willing to supplement this Justification Statement with additional written information.