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8 Attorney for Defendant,  
9 ROBERT CIRILLO

10 **UNITED STATES DISTRICT COURT**  
11 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

12 UNITED STATES OF AMERICA,  
13 Plaintiff,

14 vs.

15 ROBERT CIRILLO,

16 Defendant

) CASE NO. 22-CR-00077-DOC

) **DEFENDANT ROBERT CIRILLO'S**  
) **SENTENCING POSITION**

) **Sentencing Date: September 6, 2022**

) **Time: 7:30 a.m.**

) **Place: Hon. David O. Carter, District**  
) **Judge of the United States District Court**

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20 )  
21 **TO THE HONORABLE DAVID O. CARTER, JUDGE OF THE UNITED STATES**  
22 **DISTRICT COURT AND TO THE UNITED STATES ATTORNEY'S OFFICE, FOR**  
23 **THE CENTRAL DISTRICT OF CALIFORNIA:**

24  
25 Defendant Robert Cirillo, by and through his attorney of record, Ronald D. Hedding,  
26 hereby submits the following sentencing position for the Court's consideration.

27  
28 This sentencing position is based upon the attached memorandum of points and  
29 authorities, the Presentence Report, the numerous letters of support for the defendant, the files  
30 and records in this case, and such further evidence and argument as the Court may permit.  
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1 DATED: August 30, 2022

2 Respectfully submitted,

3 /s/: Ronald D. Hedding  
4 RONALD D. HEDDING  
5 Attorney for Defendant  
6 ROBERT CIRILLO  
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**MEMORANDUM OF POINTS AND AUTHORITIES**

**INTRODUCTION**

On June 28, 2022, defendant pled guilty to a three-count Information, charging Count 1 - Securities Fraud, Count 2 - False Tax Return and Count 3 - Conspiracy to commit Wire Fraud. The defense has no objection to the Presentence Investigation Report (PSR) and concurs with the United States Probation Office's (USPO's / Probation's) calculation of the adjusted offense level and criminal history.

The USPO filed its PSR and disclosed its letter of recommendation on August 2, 2022. The USPO calculated a base offense level 7, added 20 levels pursuant to specific offense characteristics (which are broken down in the PSR), added 3 levels for a multiple count adjustment and took 3 levels off for acceptance of responsibility, causing the total offense level to be 27. The USPO found the defendant's criminal history Category to be I, yielding a total imprisonment range of 70-87 months under the United States Sentencing Guidelines (USSG). The USPO recommends a variance sentence of 63 months, a 3-year term of supervised release, that fees be waived, restitution to the victims as specified, a \$100 special assessment and other terms as specified in detail in their report.

The defense respectfully requests that the Court sentence defendant to: (1) 37 months in federal custody; (2) 3-years supervised release, (3) appropriate restitution to compensate victims, and (4) a mandatory special assessment of \$100.

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**STATEMENT OF FACTS**

The defense has stipulated to the detailed facts laid out by the probation officer in the PSR. The defendant met with the Government and agents in two separate proffer sessions to assist in their investigation. He would like the court to know that he did not play a specific role in the “Grandfather scheme” as outlined in the PSR. The Government has not provided any evidence to support the argument that the defendant was directly involved in that scheme. The link to the defendant appears to be monies going through his accounts related to that scheme.

**SECTION 3553 (a) FACTORS**

The overriding principle and basic mandate of Section 3553(a) requires district courts to impose a sentence “sufficient, but no greater than necessary,” to comply with the four purposes of sentencing set forth in Section 3553(a)(2): retribution (to reflect seriousness of the offense, to promote respect for the law, and to provide “just punishment”), deterrence, incapacitation (“to protect the public from further crimes”) and rehabilitation (“to provide the defendant with needed educational or vocational training, medical care, or other correctional treatment in the most effective manner”).

In determining the sentence sufficient but not greater than necessary to comply with the Section 3553(a)(2) purposes of sentencing, the court must consider several factors listed in Section 3553(a). These are: (1) the nature and circumstances of the offense and the history and characteristics of the defendant; (2) the kinds of sentences available; (3) the guidelines and policy statements issued by the Sentencing Commission, including the advisory guidelines range; (4) the need to avoid unwarranted sentencing disparity; and (5) the need to provide restitution where applicable. 18 U.S.C. Section 3553(a)(3), (a)(5)-(7). Neither the statute itself nor United



1 States v. Booker suggests that any one of these factors is to be given greater weight than any  
2 other factor.  
3

4 The defense requests the court consider the following mitigating factors:

- 5 1) Defendant has a limited criminal record consisting of traffic related offenses.
- 6 2) Defendant accepted responsibility at an early stage in the proceedings and proffered  
7 with the Government.  
8
- 9 3) Defendant has been working since on pretrial release and has had no issues while on  
10 release.  
11
- 12 4) Defendant has provided for his family and is a key figure financially and emotionally  
13 for his wife and children (his wife has written a letter describing him as a family man  
14 that would do anything to assist his family, including helping her with a serious  
15 medical condition).  
16
- 17 5) Defendant's wife also indicates for the Court that the defendant has health concerns  
18 related to an angiogram and open-heart surgery he had in 2011 and the prescriptions  
19 and medications he still must take to survive (defendant's numerous health issues and  
20 medications he takes are described on page 25 of the PSR).  
21
- 22 6) Defendant's adult children have submitted letters on his behalf and describe him as a  
23 loving and caring father whom they look up to and who has taught them many  
24 important values.  
25
- 26 7) Several members of the community and his family have submitted letters on behalf of  
27 the defendant, speaking to his good character and his place in society as a solid  
28 citizen.  
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1           8) The various letters attached to this sentencing position speak of a selfless family  
2           member, caring husband and father and solid person.  
3

4 **THE DEFENSE REQUESTS THE COURT RECOMMEND THE RDAP PROGRAM**

5           As noted on page 26 of the PSR over the past four months, defendant has been  
6           consuming 3-5 glasses of red wine nightly. Further, defendant explained that he has been very  
7           stressed out over the instant offenses and sites a growing alcohol addiction. To his credit  
8           defendant has begun attending 12-step meetings and sought counseling from the priest at his  
9           local church (see page 8 of Probation's recommendation letter). The defendant clearly needs  
10          assistance with substance abuse related issues, hence the defense respectfully requests the court  
11          recommend the RDAP program.  
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15 **THE DEFENSE REQUESTS A DOWNWARD VARIANCE FROM THE ADVISORY**  
16 **GUIDELINES**

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18          It is the defense's request that the Court consider the defendant's age and ability to earn  
19          in passing judgment upon him. He is a 61-year-old family man who can work and provide for  
20          his family while paying back the substantial amount of restitution owed in this case.  
21

22          Further, as noted in the PSR, defendant has always been gainfully employed and as a  
23          collateral consequence of his conduct, will no longer be able to financially contribute to his  
24          household. This will certainly create a substantial strain on his wife, who suffers from a serious  
25          health condition, which makes it difficult for her to maintain steady employment (see Probation's  
26          recommendation letter at page 9).  
27  
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29          Finally, as noted in Probation's recommendation letter, defendant has significant health  
30          issues himself for which he is dependent upon a variety of medications. Given defendant's  
31          advanced age at the time of released, coupled with his health issues, it is believed by Probation  
32

1 that he will be less of a risk of harm to the community. Defendant has the tool set to put his  
2 skills to work for good. In balancing the need for incarceration versus giving the defendant the  
3 opportunity to make the victims whole and keep his family afloat, we urge the court to choose a  
4 sentence that gives the defendant an opportunity to show he can do good for all parties concerned  
5 and be a father to his children.  
6  
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8 **CONCLUSION**

9 For the foregoing reasons, defendant respectfully recommends the Court sentence him to  
10 37 months in prison, 3-years of supervised release, restitution to the victims and other terms the  
11 court deems appropriate.  
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14 Respectfully submitted,  
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17 \_\_\_\_\_  
18 RONALD D. HEDDING

19 FOR DEFENDANT

20 ROBERT CIRILLO  
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July 27, 2022

The Honorable David O. Carter  
Ronald Reagan Federal Building and U.S. Courthouse  
411 West Fourth Street  
Courtroom 10 A  
Santa Ana, CA 92701-4516

Your Honor,

I am Rob Cirillo's wife. We have known each other for almost 28 years and happily married for over 21 years. Thank you for allowing me to share with you about my husband.

Since we first met, Rob's number one priority in life has been his family. When we met, I had two children from a previous marriage, and Rob had one. He was committed to providing a loving environment for our blended family. Rob never treated my children any differently than he treated his daughter. They quickly embraced him as a father and knew they could come to him for anything.

In 2003, our son Anthony was born. Rob was very hands-on with Anthony from a young age. Anthony followed his father's example and was very studious and an overachiever Rob insisted that the children were active, so they spent lots of time outdoors, in sports, and school activities. We took lots of family vacations. He taught our children the importance of giving to others. Every Christmas, he takes the children shopping to purchase toys to donate to the local fire station toy drive. As a family, we deliver the gifts and thank the firefighters for their service. This has become an annual tradition and has inspired our kids to have a heart for others. I could not ask for a better father for our children.

Rob is unbelievably generous. My family came from very modest means. My father worked in a Coca-Cola factory, and while he provided for our family, he could never afford any luxuries. My father loved watching sports. Several years ago, Rob decided to surprise my father with a large screen television that he purchased for him. My dad was overwhelmed and often spoke of this gift up to when he passed. Rob has cared for my mother in her advanced years, supporting her medical needs. When she was stricken with a brain tumor, he spent quality time with her at least several times a week. When my extended family visits us from Costa Rica, Rob rolls out the red carpet for them. Family is everything to Rob.

In 2011, Rob went in for an angiogram and found out he needed open heart surgery. His arteries were about 85% blocked. Seeing my husband struggle to recuperate was difficult. He is used to always taking care of his family and has always been the main provider. The repercussion that came from having surgery and needing to make life-style changes with his choices in food and exercise were also overwhelming for him. The medication he would need to take for the rest of his life and the numerous treatments to help keep him alive are exhausting. Needless to say, he was able to overcome these obstacles and persevere. My husband is the most determined

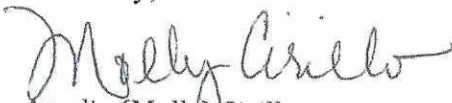


and I will not ever let go. I do not have no doubt, given the opportunity, he will rectify this situation and bring us whole again.

I've been diagnosed with fibromyalgia for a little over nine years. This illness, at times has taken over me. The person I knew, is no longer the same person today. Rob has been by my side since day one of my symptoms. From an insane amount of tests, followed by numerous therapies, treatments, experimental medications, neurologists, rheumatologists and urgent care visits. My husband has never stopped trying to help me find a form of relief. Away that I can regain all of my functions and feel no pain. Regrettably, this hasn't happened yet. Even with everything that is transpiring, he is relentless in his search.

I appreciate the challenging job of a judge and how you must consider many things beyond what I have shared in this letter. It may be challenging to reconcile Rob's business mistakes with the heart of a man who has otherwise faithfully served his family and community with commitment and passion. Our family (which now includes our ten-month-old granddaughter) and our entire community needs Rob and will continue to love and support him. Thank you for your attention to this letter and your consideration in returning Rob to our family and me as quickly as justice allows.

Sincerely,



Amalia (Molly) Cirillo

Erika Ledesma

11862 S. Esplanade

Orange, CA 92869

July 28, 2022

The Honorable David O. Carter  
Ronald Reagan Federal Building and U.S. Courthouse  
411 West Fourth Street  
Courtroom 10 A  
Santa Ana, CA 92701-4516

Dear Judge Carter,

Rob Cirillo is married to my Aunt Molly. I have known Rob since 1995. I am privileged to offer my support to Rob during this difficult time.

His sense of humor is the first thing that captures you when you meet Rob. He has the gift of bringing everyone together through laughter. He has great energy and always maintains a positive attitude. We have a very blended family (Latino, Mexican, Costa Rican, Armenian, and Italian). A traditional Thanksgiving dinner turns into an ethnic smorgasbord, with Rob bringing a great Italian dish.

Rob and Molly are our daughter's godparents. Rob, raised in the Catholic Church, takes this role very seriously and has always been there for her with his faith, support, and great

Rob always makes sure everyone is well taken care of. He cares for people.

Rob is extremely humble. He never flaunts or boasts about his generosity. When Rob learned that my grandmother's driveway needed repairing, he showed up one weekend to take care of it. When someone is sick, he is the first person to come over with a book and a bowl of soup. When my husband passed away, Rob was the first one there to help with so many details that were way too overwhelming for me to process at the time.

Everyone makes mistakes, even the best people like Rob. I believe his mistakes were sourced from his desire to be a great provider to his family. That is not an excuse but an explanation. He is remorseful and told me he is committed to making things right. I worry about his health as his history of heart issues leaves him in a vulnerable state as this event takes its toll. I know Rob will grow from this experience. I hope this can be resolved quickly and that his laugh that lights up every room can return soon.

Sincerely,

  
Erika Ledesma

4173 Trailcrest Drive  
Moorpark, CA 93021

July 29, 2022

The Honorable David O. Carter  
Ronald Reagan Federal Building and U.S. Courthouse  
411 West Fourth Street  
Courtroom IOA  
Santa Ana, CA 92701-4516

Your Honor,

I would first like to thank you for taking the time to read this letter. I understand you are very busy and I appreciate the time you are taking to go through the numerous letters depicting what a caring person my father is. My name is Victoria Loman and I am the daughter to Robert Cirillo. As I'm sure you can imagine, I am overwhelmed with emotion and I am finding it very difficult to describe my fathers character in a short letter.

I was about two years old when my parents divorced. He has stepped up and played an integral part in my upbringing even after my parents divorced. Most of my positive childhood memories in life involve my father. Growing up, our family has experienced difficulty. Regardless of what challenges we faced, my father would ensure we got through it and always made it a point to be present. In high school, I was active in Student Government. My dad helped make my posters when I ran for office. Growing up he never missed an award ceremony or graduation. Even while recovering from open heart surgery, he was there cheering for me at my high school graduation. I have always cherished the time spent with him when I was younger and enjoy it even more now, as an adult.

Although he often has a serious, tough exterior, he is warm and soft inside. My dad would give the shirt off his back to his family, friends, and anyone in need. My dad has always been very intentional with his relationships and always knows how to brighten the room with laughter and smiles. Not only is my father



My husband and I have recently been blessed with a 10-month old baby girl, and I love seeing my dad be a grandfather and be a part of her life. The bond they already share is irreplaceable. I am consistently finding myself mirroring the love and values he instilled in me and my siblings growing up.

My dad honestly shared his legal problems with both my husband and myself. He has continued to keep us informed. However, it is painful for him every time he shares about this. I am very concerned about his health during this time. He is embarrassed and disappointed in himself for the careless mistakes he has made. I love my dad more than I can put into words and I hope this can be resolved quickly. Thank you again for allowing me to share about my dad.

Sincerely,

  
Victoria Loman

July 28, 2022

The Honorable David O. Carter  
Ronald Reagan Federal Building and U.S. Courthouse  
411 West Fourth Street  
Courtroom 10 A  
Santa Ana, CA 92701-4516

Dear Judge Carter,

I am Rob Cirillo's son. I am an 18-year-old freshman at Mt. San Antonio College. I am proud to write this letter on behalf of my dad, who is also my best friend.

I love my dad for his commitment to his family. He has always worked very hard to provide well for us and be present in my life and the lives of my siblings. I recently was struggling with some mental health issues. My dad was so easy to talk to. I could not believe how comfortable speaking to him about my challenges was.

My dad has gone above and beyond to be active in my life. When I was five years old, my dad was home recovering from major heart surgery. I had a little league game that afternoon and asked my mom if dad would be at the game. She said probably not, as the doctor had recommended, he stay in bed.

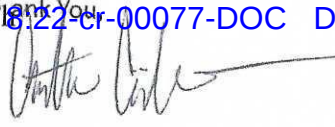
I will never forget when I came up to bat and saw my dad in the stands. He wasn't going to miss my game.

I am thankful to my dad for the many lessons he has taught and modeled for me, especially around generosity and showing care for others. Every Christmas, we have a family tradition to shop for gifts for underprivileged kids and deliver them to the local fire station. My dad is always kind to servers and staff workers at restaurants and stores and tips well. He has encouraged us to volunteer at school and community events. He has taught me that generosity is not just financially but giving our time and attention to others.

My dad has taken the time to explain the mistakes he made. As he described some details, it sounded like someone else, not my dad. He has stressed to me the importance of accountability and taking responsibility for our conduct. It is clear to me, as it is to others who know my dad, that he will do whatever he can to make things right with the victims of his crime and society.

My dad is so important to me, especially as I go through the most impactful years of my life. I am also very concerned about his health given his history of heart problems and the toll this matter continues to have on him. It would mean the world to me to have him home as soon as possible.



Thank You  
  
Anthony Cirillo

Ann Melkonian  
22 Viewpoint Place  
Laguna Niguel, CA 92677

July 28, 2022

The Honorable David O. Carter  
Ronald Reagan Federal Building and U.S. Courthouse  
411 West Fourth Street  
Courtroom 10 A  
Santa Ana, CA 92701-4516

Dear Judge Carter,


I am Rob Cirillo's sister-in-law. He is married to my sister, Molly. Rob is a wonderful part of our family and a very good man. I am happy to write this letter of support.

Molly's first marriage did not go very well, and I prayed that she would find a man that would love her well. Rob was the answer to my prayer. Not only does he cherish Molly and treats her well, but he also embraced her two children from the day he met them. It is the model of how a blended family can work, and much of that credit goes to Rob. Rob is so devoted to his family. He provides for them, he has been active throughout the kids' lives, and he strives to give them the very best of him every day.

Rob has great compassion for people. Recently, Molly and I had a nephew who passed away very young. Rob was the first to be there for the family, organizing meals and helping them with logistics. He was also there for our mother when she was very sick in 2019. He visited her multiple times weekly, talking with her and tending to her needs. Rob is someone you can count on when things are tough.

Our whole family is devastated by these recent events. Rob is remorseful, and you can see it in his face. He is usually a very upbeat person, but there is sadness and embarrassment to his appearance. Rob's mistakes were clearly out of character and unexpected, which is why it has such a profound effect. I know Rob is committed to making amends, and our family will be there to support him. Please extend as much leniency as you can so he can have the opportunity to pay back the victims and be restored to our family.

Sincerely,

  
Ann Melkonian

Paris Roumbos  
13639 Monte Verde Drive

July 28, 2022

The Honorable David O, Carter  
Ronald Reagan Federal Building and U.S. Courthouse  
411 West Fourth Street  
Courtroom 10 A  
Santa Ana, CA 92701-4516

Your Honor,

I have known Rob Ciriilo for about 15 years since our sons first played baseball together in little league. Throughout those 15 years, Rob has proven himself to me to be a loyal friend with a big heart. I appreciate the opportunity to write this letter of support for Rob.

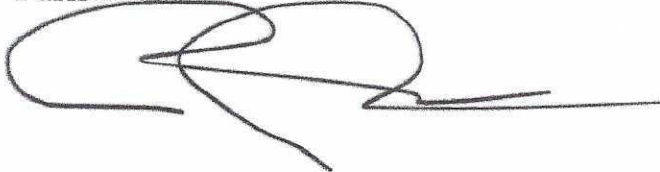
Rob is someone I can always count on, especially when it comes to my kids, He treats my son as one of his own, taking him to baseball games, camping, and vacations and doing everything he can to include my son and treat him better than any parent would want their child to be treated. Very few people I trust my children to, and Rob has consistently proven himself to be a person I can trust. If there is ever an emergency, Rob would be at the top of my list to care for my kids because of his compassion and care for others.

Rob has a huge heart for people. He has often helped other friends and me with fix-it projects, moving, or even a listening ear during a difficult time. Rob is active in our community, regularly helping with community fundraising and other volunteer activities. I admire Rob for always being willing to step up when asked.

Despite his bad choices, I ask that you have mercy on Rob during his sentencing. Everyone makes mistakes, and although there are consequences for our actions, I believe in forgiveness and giving deserving people like Rob second chances. Rob's family needs him, especially his children and his new baby granddaughter. He is the heart of his family. Although my relationship with Rob began as a fellow parent in the bleachers I joked with; he has truly turned into family. Thank you for allowing me to share my feelings about my friend.

Sincerely,

ParisRoumbos

A handwritten signature in black ink, appearing to read 'ParisRoumbos', with a large, stylized initial 'P' and 'R'.

Al Calvanico  
4092 Ferndale Avenue  
San Bernardino, CA 92404



The Honorable David O. Carter  
Ronald Reagan Federal Building and U.S. Courthouse  
411 West Fourth Street  
Courtroom IOA  
Santa Ana, CA 927014516

Your Honor,

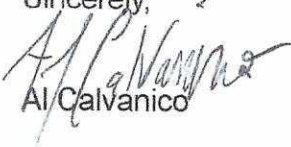
Rob Cirillo and I have been friends for over 50 years. We grew up three blocks from each other in Brooklyn and ended up in California. Rob is one of my closest friends, and I hope this letter helps him through this difficult time.

Rob is tough. When we first met, he went to a Catholic School in Brooklyn while I attended the local public school. He would have to walk by my house and on his way home from school, and he would get teased for his school uniform. Rob didn't back down and stood up for himself. We became instant friends.

I was a groomsman at Rob's first wedding. He and his wife later lived with our family in 1990. Rob's love for children was evident when his daughter Victoria was born. Later, when he met Molly and they combined families, Rob poured everything into being a husband and father. He is active and present in their lives. He is smitten with his new granddaughter.

Rob is a loyal friend who will do anything for you. I lost my wife nine years ago to cancer. Rob knew her well from our childhood days in Brooklyn. She was at the City of Hope hospital, and Rob came alongside us from when she was diagnosed to her last days. I will always be grateful to Rob for his love for my family during that time. I am amazed at how Rob is handling this legal setback. He is remorseful and committed to making amends to those he has harmed. He has been open and honest with his children about his mistakes, using this as a teaching opportunity. He is taking inventory of what has happened and how he can do better going forward. The strength of Rob's character is shining through this challenging situation. I pray that he receives grace and mercy and can be restored to his family as quickly as possible.

Sincerely,



Al/Calvanico

Mark Cirillo  
155 Delaware Ave.  
Atlantic Highlands, NJ 07716

July 29, 2022

The Honorable David O. Carter  
Ronald Reagan Federal Building and U.S. Courthouse  
411 West Fourth Street  
Courtroom 10 A  
Santa Ana, CA 92701-4516



I am shaken by how difficult it is for me to write this letter. I wish you would know my brother the way I know him. I don't know where to begin, but I will do my best to help you understand who my brother is. Rob was a great older brother. He helped me with school, stood up for me when I got in trouble and was always there for me whenever I needed help with anything. We grew up in a great Catholic family where faith and family were everything. I fondly remember Sunday dinners. Rob and I were very close then, and we remain close today.

Rob is unbelievably caring. He has had the gift of generosity from a young age. He has supported me through some difficult stretches of my life, including a nasty divorce and child custody battle that I went through several years ago. Rob is non-judgmental and always looks for the best in others.

Since we were little kids, Rob has loved Christmas. During our teenage years growing up in Brooklyn, he would dress up as Santa and go throughout the neighborhood distributing gifts that he bought with his own money from his job. He continued to do this into his 20s. I knew back then that Rob loved children and one day would be a great father.

When Rob and Molly were married, he embraced her two children as if they were his own. I am in the car business, and when Jordan turned 16, Rob called me to help purchase a car for him. Rob helps his family and friends financially and with his time and presence. He is the first to help when you need someone to help you move or with a project around the house.

Rob is very remorseful for his mistakes. He wants to make restitution to the people he has affected. He has told me numerous times that this is his number one priority. I am confident that Rob will find a new way to use his gifts and be a contributing member of society. Thank you for taking time off your busy schedule to read this letter. I realize you have many things to consider in this case, but I hope these words can guide you into making a good decision and giving Rob a second chance in life.

Sincerely,



Mark Cirillo

Vanessa Ann Romero  
14008 Birdsong Lane  
Chino Hills, CA. 91709  
Re: Robert Louis Cirillo

July 28, 2022

To The Honorable Judge David O. Caner,

My name is Vanessa Romero and I am Robert Cirillo's step-daughter I actually don't consider him a "step" it's more like a second father. Someone I have relied upon for most of my life. I would like to take a few minutes of your time to explain.

I have known Rob since I was 2 years old. I am now 29 and currently enrolled full-time at West Coast University. I have a little over a year to go to obtain my Bachelors Degree in Nursing.

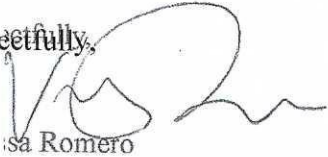
My parent's got a divorce when I was very young and even though they kept a very amicable relationship, it was a difficult time for me. I can't ever recall a time when I've asked Rob for help or guidance and he hasn't come through. Not only has he made my life easier, but he has gone way and above to earn my respect and love. I remember him taking us to school, playing the music in the car, singling and talking to us about our day I'll never forget him attending our

High School for that. I came only once in the 20 years I always wanted and still to this day wants to know what we are thinking and doing in our lives. Rob has always been a caring and generous person. He's a hard worker and very dedicated to providing for our family. I recall a time back in May 2011. It was a very intense time for all of us and completely unexpected. Rob needed a quadruple bypass open-heart surgery. Only to find out a month later that they missed an artery and he needed additional surgery. This occurred while my sister Victoria and I were in our final days of our Senior year in High School. Rob was barely able to walk. The middle of summer and tons of stairs to climb to get to our graduation. We both asked him to stay home and rest, but he refused. Rob insisted that he needed to be there to watch us both graduate and he did. I'll never forget the proud look on his face.

Rob and I have spoken about his case and he is truly remorseful. I know in my heart that his feelings are genuine and truthful. It is my sincere hope that the court can take note of his kindness and that I was able to relay some of my life experiences about Rob. I am honored to be his daughter and to write this letter on his behalf. I thank Your Honor for this opportunity.

Vanes

Respectfully,



Vanessa Romero  
Romero Vanessa  
romer054(ccvahoo.com) (909)576-8321

### WEST COAST SPORTS & PAIN CENTER

Dr. Leon S. Melkonian

P.O. Box 2687

Costa Mesa, CA. 92628-2687

(714)438-1190 (949)412-1103 cell

(714)439-1191 fax

lmelkonian@cox.net

July 20, 2022

Re: Robert Louis Cirillo

To The Honorable Judge David O. Carter,

My name is Leon Melkonian. I am writing this letter for my friend who also happens to be my brother-in-law. I've had the pleasure of knowing Rob for approximately 25 years.

Throughout the years that I've known Rob, he has always been a dedicated husband, father, son, brother and uncle. Family is very important to him. I recall a few years ago celebrating Christmas Eve at his house, which we always have. He surprised the entire family with a trio of Christmas carolers. It was such a nice gesture and we all enjoyed it very much, especially my mother who at the time was 86. Rob has always gone out of his way to make everyone happy. He has a way of making everyone feel comfortable and welcomed in his home.



live had oral conversations with Rob regarding his charges and he has expressed his deepest regrets. I also know that given the opportunity, he will pay back the monies owed. I can clearly see a good man who is in distress and extremely remorseful for his actions.

It is my hope that this letter will give you an idea of Rob's good character and allow him an opportunity at a second chance to prove himself by rectifying this horrible situation.

Thank you for taking the time to read this letter.

Respectfully,



Leon Melkonian  
Honorable David O. Carter

Your Honor,

My name is Elizabeth Wooden and I have had the privilege of being the next door neighbor to Robert Cirillo for almost 20 years. I was thrilled when Molly, his wife, asked me if I'd be willing to write a character reference letter on Rob's behalf. I couldn't write it fast enough. Rob is the absolute perfect neighbor, acaring friend, amazing father, and a loving husband who I have had the privilege of witnessing first hand. I have seen him interact with his family and friends for many years and I can honestly tell you that you could not ask for a better neighbor and friend. He has cared for my daughter as if she was his own. My daughter loved the days when Rob was the driver in our school carpool. She would come home and tell me so many funny stories and how sweet and kind he always is to everyone.

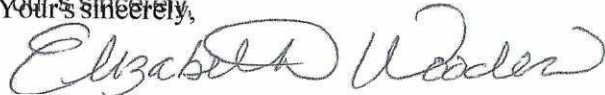
When we leave for vacation, he always watches our house for us and takes care of everything, including lawn care. We have given him a key to our house and feel completely comfortable with him coming and going to make sure the house is safe and secure.

We always include him, his wife, and kids to all our family get togethers and parties. We have had such good times with Rob and all of the Cirillo's over the years.

Rob has been very honest and upfront with me about what he has been charged of. I know it must be difficult for you to make a decision when you do not know Rob personally. I can tell you that if you only read my letter, please know that the man standing in front of you is caring, loving, generous, hard working and you would be lucky to call him your neighbor like I do.

I'd be happy to come in and talk about Rob and his character to you directly or in front of anyone and anytime. So please do not hesitate to ask at anytime.

Yours sincerely,



Elizabeth Wooden  
909-263-8080  
elizabethwooden@gmail.com  
July 2, 2022

To the Honorable David O. Carter,

I am writing to you in regards of Robert Cirillo. I have known Rob since 1995. In that time he married my cousin Amalia Cirillo and took the responsibility of husband and



step father of Amalia's two children Vanessa and Jordan as well as already being a dad to his daughter Victoria. Rob has always made sure to be a good husband and father to them as well as to his and Amalia's son Anthony who just graduated high school and who is a good student and athlete.

Rob has always been a patriotic individual and to my knowledge has never knowingly broken the law, he is not a violent person and I would hope he could be shown leniency for this first time offense.

Incarcerating Rob would put a strain on his wife who is afflicted with Fibromyalgia and also on Anthony who is just starting out in life and is extremely close to his dad, also Rob just became a grandfather this year when his daughter Victoria had a baby girl.

A little on my background, I served in the United States Marine Corps from 1989 to 1992. I served as Infantryman during Desert Shield/Storm. An injury prevented me from making the Marines a career after the cutbacks in the early 90's. I have been working in the Security Industry for the past 23 years working with Armored Car, Nuclear Security, Private School Security and now doing Estate Security.

Sincerely

Jeffrey G Vargas  
714-296-1720

Grettel Lomeli  
2507 Deerpark Drive  
Fullerton, CA 92835

August 2, 2022

The Honorable David O. Carter  
Ronald Reagan Federal Building  
and United States Courthouse  
411 West Fourth Street  
Courtroom 10 A  
Santa Ana, CA, 92701-4516

Re: US v. Cirillo

Dear Judge Carter:

I am Robert's sister-in-law and have had the pleasure of knowing him from early on in his relationship with my sister Amalia. He has been a wonderful addition to the family as a husband, father and incredible friend.

Robert is one of those people who is always giving. Whenever a friend or someone in our family is in need, Robert readily begins to help without even being asked. When I first met Robert, I was doing well financially, and his firm was managing my investments. However, I lost my job at one point and had a hard time making ends meet. I was even at

risk of losing my home. Robert found work for me and ensured I never missed a bill or payment. I'll never forget how he went out of his way to save my family.

Robert has done likewise for my mother. Whether, it's tickets to pay for her travel, buying things for her home or helping her out when she has been in dire financial straits, Robert can always be counted on to help. My mother is eternally grateful for having Robert in her life.

Robert is also a great father. He can always be found enjoying his children and fully supporting all of them. He treats Amalia's children from her first marriage as his own and even my four children look up to him as a father figure when it comes to advice. He generously shares his time and money, making everyone feel loved and welcome.

I was so shocked when I learned the news of the case against Robert. He is such a kind and wonderful person, there's not an ounce of selfishness in him. I have never seen or known him to hurt anyone. He has candidly admitted his guilt and shared how sorry he is for committing a crime and risking his family's welfare in the process. This conduct is so out of character and I know he would never commit a crime again.

Robert is an amazing person and family man. Robert's absence will leave a gaping hole in our family dynamic and I hope you can see fit to returning him to us as quickly as possible.

Sincerely,

Grettel Lomeli

A handwritten signature in cursive script, appearing to read "Grettel Lomeli".



Kristy Aguirre  
3809 Conning Street  
Jumpa valley, CA 92509

July 29, 2022

The Honorable David O. Carter  
Ronald Reagan Federal Building and U.S. Courthouse  
411 West Fourth Street  
Courtroom 10 A  
Santa Ana, CA 92701-4516

Dear Judge Carter,

I have been dating Rob Cirillo's stepson, Jordan Romero, for the past three years. Over this time, I have come to admire and respect Rob very much. I was honored when he asked if I would write a letter of support on his behalf.

Rob is the quintessential family man. His calendar revolves around his family. Whatever the event, big or small, he is there. He is everyone's cheerleader and biggest supporter. I did not have a close family growing up, so this has been amazing for me to experience such genuine love and closeness.

Rob is very open and honest and a great listener. Jordan communicates with Rob better than any other person in his life. He shares his concerns and problems with him. Rob is very interested in what another person says. When I am with him, I feel he is interested in my opinions and what I have to say. I rarely experience that with anyone else.

When Molly's family visits from Costa Rica, Rob goes out of his way to make them feel special. Rob loves to cook and entertain; he loves caring for other people. The biggest joy in Rob's life is his new granddaughter Rob has an endless supply of love, and she is a big recipient.

This legal matter has rocked the family and affected everyone. Rob is the foundation of the family. The vibrancy and energy he exudes typically every day have been dampened. I know Rob is remorseful for his mistakes. He is sad that he not only hurt his former clients but he has hurt his family and friends. I pray that you can find it in your heart to identify an alternative within the parameters of our justice system to have Rob home as quickly as possible. Thanks for your attention to this letter.

Sincerely,



Kristy Aguirre

1543 E. Marion Street  
Ontario, CA 91761

July 29, 2022

The Honorable David O. Carter  
Ronald Reagan Federal Building and U.S. Courthouse

411 West Fourth Street  
Courtroom 10 A  
Santa Ana, CA 92701-4516

Your Honor,

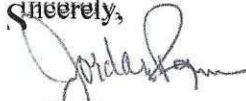
My name is Jordan Romero. Rob Cirillo is my stepfather, married to my mother, Molly. Rob has significantly influenced my life, and I am privileged to write a letter of support for him.

My parents divorced when I was five years old and although my biological dad has always been in my life, Rob quickly became a great father to me as well. Rob's love and devotion to his new family provided us with a great childhood and overall positive adjustment to the divorce. Rob has always helped me throughout my life and continues to do so everyday.

Rob is an absolute family man. Not only to our immediate family, but also to our extended family. We all know we can always depend on him. He has an infectious personality that warms every room he walks into. He makes friends everywhere he goes. Even when I was younger, people at the coffee shop or the local grocery stores would know Rob and treat him as a friend.

Rob has openly shared with me about his business mistakes. It is clear how very remorseful he is. Rob loves our family so much. It hurts him how much this has taken a toll on our family and friends. He has accepted responsibility for his actions. I am hopeful that the punishment he receives allows him to return to us as soon as possible. Thank you for taking the time to read this letter.

Sincerely,



Jordan Romero



**REPRINTED RECEIPT**

Receipt No. **IVR-2022-0009608**  
Transaction Date 08/09/2022  
Payor  
CIRILLO, ROBERT LOUIS  
14008 BIRDSONG LN CHINO  
HILLS, CA 91709

Description	Amount Paid
Payment Plan	
CIRILLO, ROBERT LOUIS 2952736RC	
The People of the State of California vs. ROBERT CIRILLO	
Legacy Conversion Fees	9.80
Legacy Conversion Fees	522.20
<b>SUBTOTAL</b>	<b>532.00</b>
Remaining Balance Due:	0.00
Remaining Payment Plan Balance Due:	\$0.00 *
<b>PAYMENT TOTAL</b>	<b>532.00</b>
IVR (Ref #196734227)	
Tendered	532.00
Total Tendered	<b>532.00</b>
Change	0.00
08/09/2022 11:47 AM	Cashier Station IVR
	Audit 54490421

**REPRINTED RECEIPT**