

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 3:07CR001

SEAN CAROTHERS

**MOTION FOR REDUCTION OF SENTENCE**  
PURSUANT TO RULE 35 FRCP

Comes now the United States of America, by and through the United States Attorney for the Northern District of Mississippi, and files this Motion seeking a reduction of sentence of the above named defendant for substantial assistance pursuant to Rule 35, Federal Rules of Criminal Procedure, and as grounds therefore would show the following:

1. That for approximately two years, Sean Carothers has assisted the United States in the investigation related to the Facility Group, the company that oversaw and managed the construction of the beef processing plant.
2. That Carothers provided expertise regarding the complex accounting methods used by the Facility Group, resulting in the discovery of a scheme to overcharge the project in labor and other expenses in the approximate amount of \$2,000,000.
3. That Carothers, from thousands of pages of source documents, provided spread sheets and other demonstrative evidence outlining the fraud.
4. That Carothers assisted the government investigators in understanding construction accounting and practices, which significantly aided the prosecutors in drafting of subpoenas, other requests for documents and materials and charges.

5. That Carothers has testified before the federal grand jury as an expert and fact witness.

6. That Carothers is ready, willing and able to testify at any trial to which he is subpoenaed.

7. That as a result of his cooperation, the United States uncovered an extremely complex scheme to defraud the State of Mississippi and other entities and individuals and has led to the indictment of three persons and five corporations.

For the above reasons and pursuant to the plea agreement in this cause, the United States respectfully requests that the Court grant at least one half reduction of the sentence of imprisonment previously imposed.

This the 21st day of April, 2008.

Respectfully submitted,

JIM M. GREENLEE  
United States Attorney

By: */s/ William C. Lamar*  
WILLIAM C. LAMAR  
Assistant United States Attorney  
MS BAR NO. 8479

CERTIFICATE OF SERVICE

I, WILLIAM C. LAMAR, certify that I electronically filed the foregoing **MOTION FOR REDUCTION OF SENTENCE** with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

A. Lee Abraham, Jr.  
ABRAHAM & RIDEOUT  
Post Office Box 8407  
Greenwood, MS 38930-8407  
E-mail: [aleeabra@yahoo.com](mailto:aleeabra@yahoo.com)

and I hereby certify that I have mailed by United States Postal Service the document to the following non-ECF participants: None.

This the 21<sup>st</sup> day of April, 2008.

/s/ William C. Lamar  
WILLIAM C. LAMAR  
Assistant United States Attorney