

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO**

Criminal Case No. 20-cr-00158-CMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. BRADLEY BUNN,

Defendant.

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**GOVERNMENT'S RESSPONSE TO DEFEDNANT'S MOTION FOR VARIANCE OR  
NON-GUIDELINE SENTENCE [DOC. 94]**

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The United States of America respectfully submits this response to the Defendant's Motion for Variance or Non-Guideline Sentence (Doc. 94).

The government believes the appropriate sentence in this matter is one within the guideline range as calculated in the plea agreement. Doc. 78. Accordingly, the government opposes the defendant's request for a variance or a non-guideline sentence given the facts of this case and the factors to be considered for sentencing under 18 U.S.C. § 3553(a).

While the defendant's prior military service is laudable, it must also be balanced with the danger posed by the defendant's actions in the instant case. When arrested on May 1, 2020, the defendant had loaded a multicam plate carrier with high-capacity rifle magazines, a knife, ballistic plates and a hydration source, and a belt with harness, assorted pouches, and a holster containing a Sig Sauer P320 handgun into his truck. Taken with the defendant's stated intentions for these devices, which includes his

preference for a bomb size that would “turn an entire shielded breach team into manageable sized parts for ziplock backs [bags] and 32 oz slurpee cups,” the facts support a sentence within the applicable guideline range.

Accordingly, the defendant’s motion for a downward variance or non-guideline sentence should be denied.

**CONCLUSION**

For the foregoing reasons, the Government asks the Court to sentence Mr. Bunn to a guideline range as calculated by the plea agreement.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 12<sup>th</sup> day of October, 2021, I electronically filed the foregoing **GOVERNMENT'S RESSPONSE TO DEFEDNANT'S MOTION FOR VARIANCE OR NON-GUIDELINE SENTENCE [DOC. 94]** with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following e-mail addresses:

Lisa A. Polansky  
Attorney for Defendant

By: s/ Maureen Carle