

There is nothing in the sentencing record that would indicate that the district court would have imposed a consecutive sentence, even if it understood that it had the discretion to do so.

VIII. CONCLUSION

Petitioners respectfully understand that the arguments presented warrant that this Honorable Court Grant the instant Writ of Certiorari.

Respectfully submitted,

In San Juan, Puerto Rico, March 25, 2020.


RAYMOND L. SANCHEZ MACEIRA, ESQ.
COURT APPOINTED COUNSEL FOR PETITIONER

IX. CERTIFICATE OF SERVICE

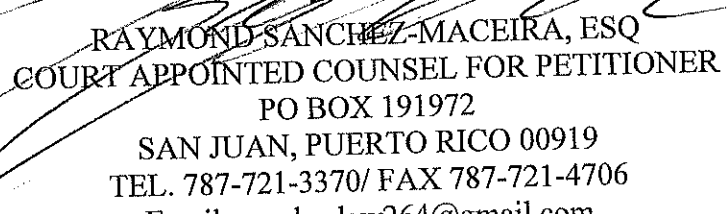
I, Raymond Sánchez-Maceira, do certify that on March 25, 2020, copies of the attached MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS and PETITION FOR A WRIT OF CERTIORARI were served to each party to the above proceeding, or to that party's counsel, and on every other person required to be served, pursuant to Supreme Court Rules 29.3 and 29.4, by depositing an envelope containing the above documents in the United States Mail, properly addressed to them with first-class postage prepaid.

The names and addresses of those served are as follows:

U.S. Department of Justice
Room 5614
Dept. of Justice
950 Pennsylvania Ave. N.W.
Washington DC 20530-0001

US Attorney's Office
Torre Chardón, Suite 1201
350 Chardón Ave.
San Juan P.R. 00918

In San Juan, Puerto Rico, March 25, 2020.



RAYMOND SANCHEZ-MACEIRA, ESQ
COURT APPOINTED COUNSEL FOR PETITIONER
PO BOX 191972
SAN JUAN, PUERTO RICO 00919
TEL. 787-721-3370/ FAX 787-721-4706
Email: sanchezlaw264@gmail.com