

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)
) Criminal No. 99-244
 v.)
) Judge Ronald L. Buckwalter
 ROBERT J. KOEHLER,)
) Filed 6/15/99
 Defendant.)

GOVERNMENT'S MOTION FOR A GUIDELINES
DOWNWARD DEPARTURE FOR ROBERT J. KOEHLER BASED ON
SUBSTANTIAL ASSISTANCE TO THE AUTHORITIES (U.S.S.G. § 5K1.1)

The United States respectfully moves the Court to depart downwards from the applicable Sentencing Guidelines in sentencing Robert J. Koehler and sentence him in accordance with the Plea Agreement reached between the defendant and the United States. The United States makes this motion pursuant to § 5K1.1 of the United States Sentencing Guidelines (Substantial Assistance to the Authorities). Mr. Koehler has offered substantial assistance and pursuant to the Plea Agreement, has pledged to continue to offer substantial assistance to the Antitrust Division, United States Department of Justice.

Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that on the 15th day of June 1999, a copy of the Government's Motion for a Guidelines Downward Departure for Robert J. Koehler Based on Substantial Assistance to the Authorities (U.S.S.G. § 5K1.1) has been express mailed to counsel of record for the defendants as follows:

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