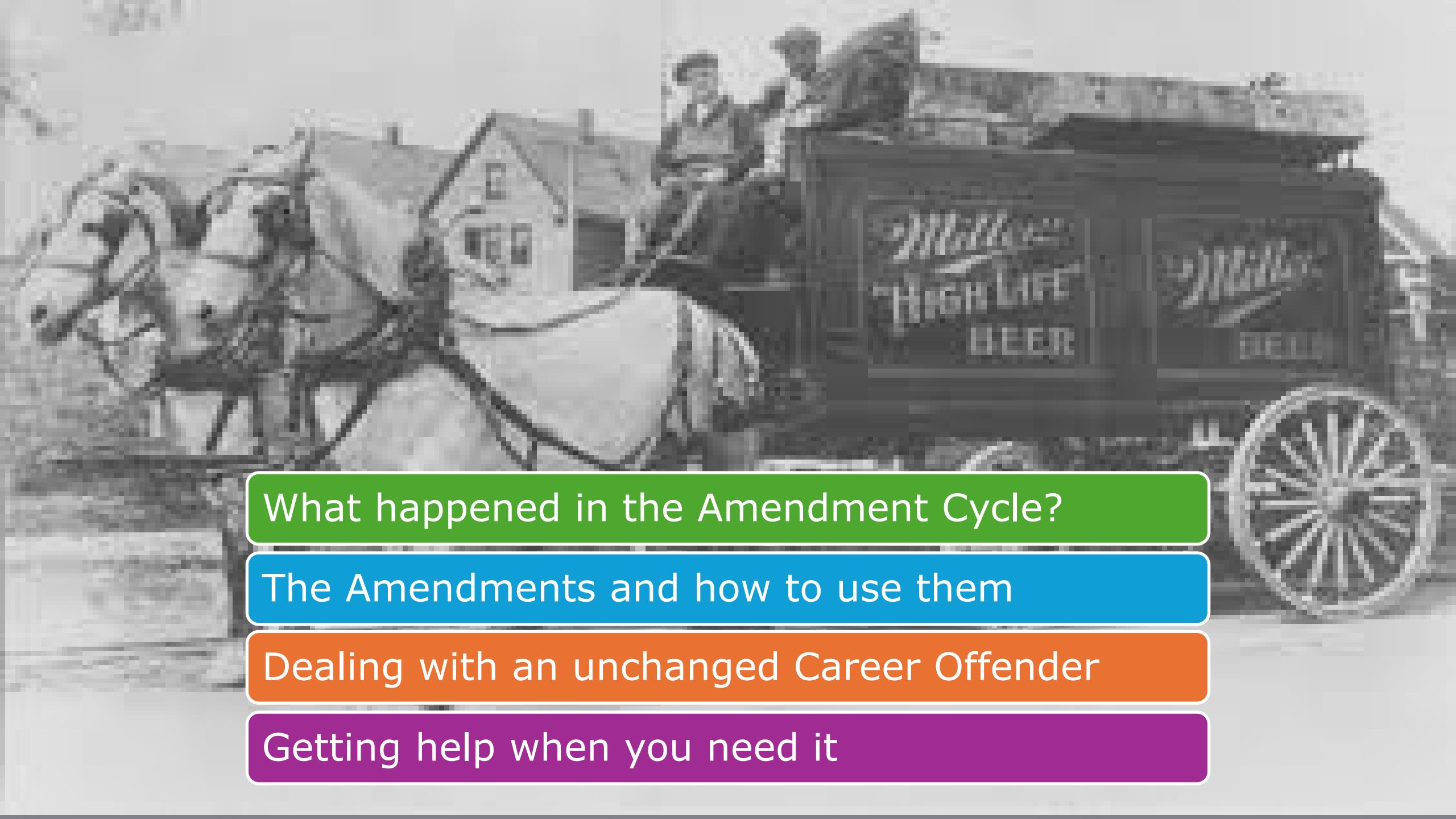




**The 2026 USSG Amendments  
(and non-amendments)**



What happened in the Amendment Cycle?

The Amendments and how to use them

Dealing with an unchanged Career Offender

Getting help when you need it



What happened in the 2025-2026 Guideline Amendment Cycle

- **The Commission considered**

- Treating meth-actual the same as meth-mixture
- Limiting what counts as a predicate drug offense for Career Offender
- Narrowing the definition of sophisticated means
- Reducing offense levels for post-offense rehabilitation



**THAT DIDN'T HAPPEN.**

- **The Commission considered**
  - Expanding sophisticated means to cover all guidelines
  - A possible *de facto* crime of violence expansion
  - Bad fentanyl specific offense characteristics
  - Bad human smuggling enhancements
  - Bad new specific offense characteristics in 2B1.1 that would basically always apply



**THAT DIDN'T HAPPEN.**





# The 2026 Amendments

# First, an important note!



- Amendments take effect on November 1, 2026
- BUT you can seek variances *now*
  - Commission's vote indicates it believes these are more in line with 3553(a)
  - Unwarranted disparity to sentence harsher than a post-November 1 case
- One Book & Ex Post Facto Rules §1B1.11

# **A. Survey of amendments**

## **SRC OUTLINE: 2026 USSG AMENDMENTS**

Prepared 4/26/26

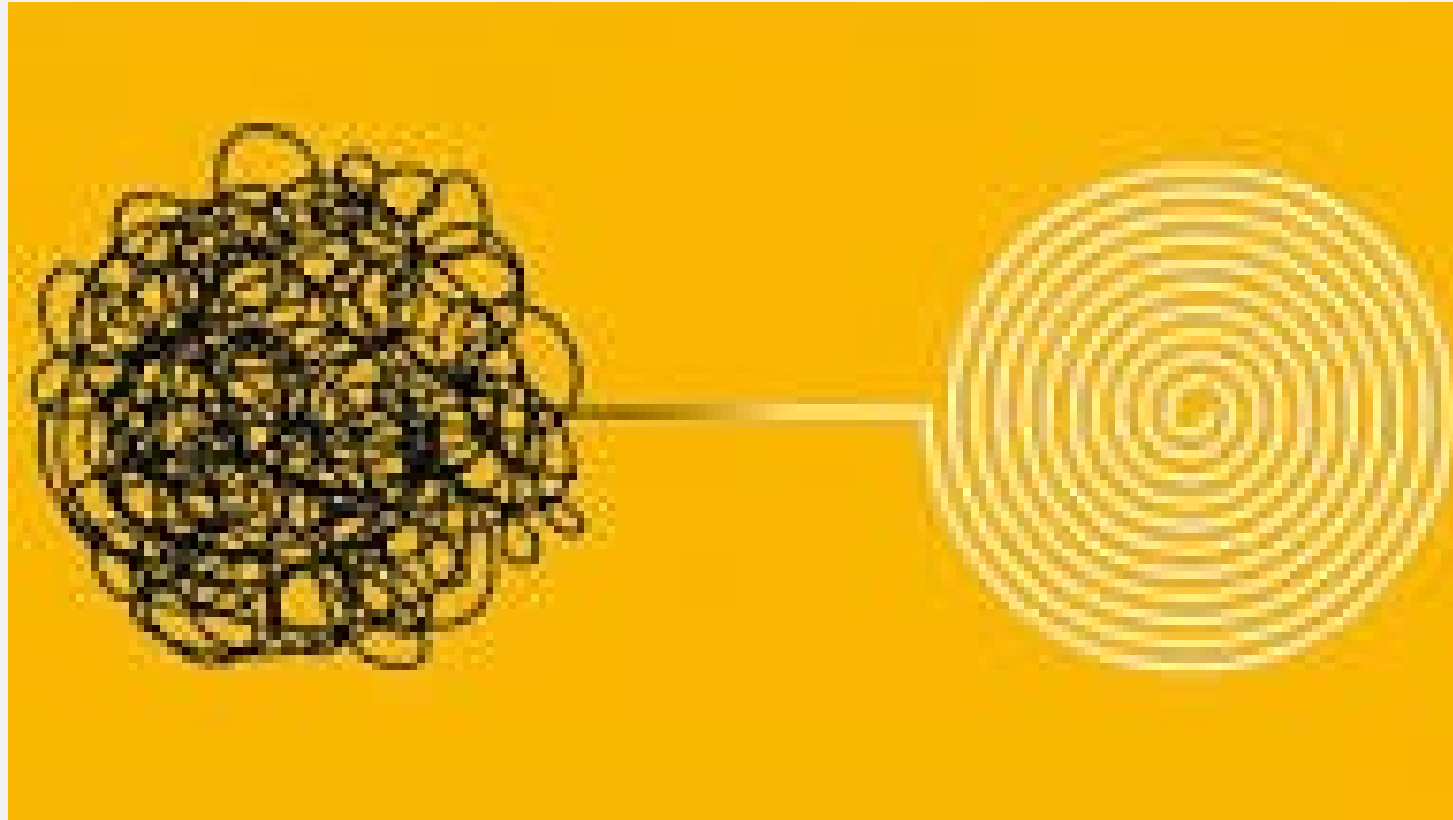
*These are presented in order of likely significance. See the full text of amendments [here](#).*

*For assistance applying these, contact SRC at [AZX\\_SRC@fd.org](mailto:AZX_SRC@fd.org) or sign up for SRC's online office hours [here](#).*

# **2026 amendments**

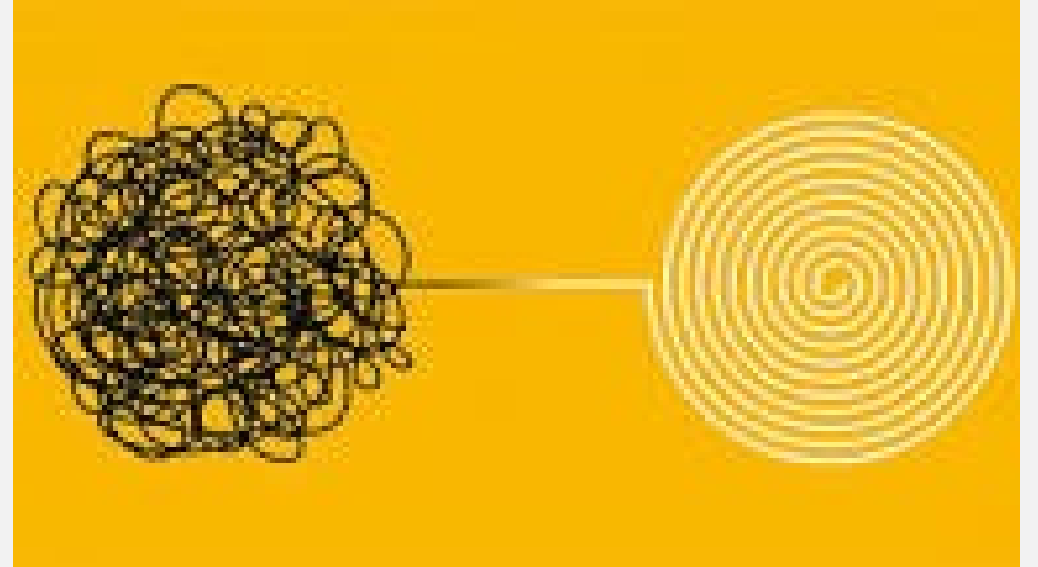
1. New multi-count (f/k/a grouping) rules
2. Inflation adjustments to loss amounts
3. Addition of "fentanyl related substances"
4. New intro to the sentencing table
5. Deletion of rarely used SOC's

# #1 New multi-count rules



# New multi-count rules

- Now, only a short list of guidelines can ever trigger additional levels
- The guidelines that have always aggregated counts (e.g. drugs, guns, fraud) still do
  - Others are still calculated count-by-count
- The highest offense level still controls
- No more units



# #2 Inflationary adjustment



**§2B1.1. Larceny, Embezzlement, and Other Forms of Theft; Offenses Involving Stolen Property; Property Damage or Destruction; Fraud and Deceit; Forgery; Offenses Involving Altered or Counterfeit Instruments Other than Counterfeit Bearer Obligations of the United States**

\* \* \*

(b) Specific Offense Characteristics

(1) If the loss exceeded ~~\$6,500~~\$9,000, increase the offense level as follows:

| <b>[MULTIPLIER USED]</b> | <b>LOSS (APPLY THE GREATEST)</b>                     | <b>INCREASE IN LEVEL</b> |
|--------------------------|--|--------------------------|
| [1.38]                   | (A) <del>\$6,500</del> \$9,000 or less               | no increase              |
| [1.38]                   | (B) More than <del>\$6,500</del> \$9,000             | add 2                    |
| [1.33]                   | (C) More than <del>\$15,000</del> \$20,000           | add 4                    |
| [1.38]                   | (D) More than <del>\$40,000</del> \$55,000           | add 6                    |
| [1.58]                   | (E) More than <del>\$95,000</del> \$150,000          | add 8                    |
| [1.33]                   | (F) More than <del>\$150,000</del> \$200,000         | add 10                   |
| [1.40]                   | (G) More than <del>\$250,000</del> \$350,000         | add 12                   |
| [1.36]                   | (H) More than <del>\$550,000</del> \$750,000         | add 14                   |
| [1.33]                   | (I) More than <del>\$1,500,000</del> \$2,000,000     | add 16                   |
| [1.43]                   | (J) More than <del>\$3,500,000</del> \$5,000,000     | add 18                   |
| [1.58]                   | (K) More than <del>\$9,500,000</del> \$15,000,000    | add 20                   |
| [1.40]                   | (L) More than <del>\$25,000,000</del> \$35,000,000   | add 22                   |
| [1.38]                   | (M) More than <del>\$65,000,000</del> \$90,000,000   | add 24                   |
| [1.33]                   | (N) More than <del>\$150,000,000</del> \$200,000,000 | add 26                   |
| [1.40]                   | (O) More than <del>\$250,000,000</del> \$350,000,000 | add 28                   |
| [1.36]                   | (P) More than <del>\$550,000,000</del> \$750,000,000 | add 30.                  |

---

**§2B3.1. Robbery**

---

\* \* \*

(b) Specific Offense Characteristics

\* \* \*

(7) If the loss exceeded ~~\$20,000~~ \$25,000, increase the offense level as follows:

| <b>[MULTIPLIER USED]</b> | <b>LOSS (APPLY THE GREATEST)</b>                  | <b>INCREASE IN LEVEL</b> |
|--------------------------|---|--------------------------|
| [1.25]                   | (A) <del>\$20,000</del> \$25,000 or less          | no increase              |
| [1.25]                   | (B) More than <del>\$20,000</del> \$25,000        | add 1                    |
| [1.58]                   | (C) More than <del>\$95,000</del> \$150,000       | add 2                    |
| [1.40]                   | (D) More than <del>\$500,000</del> \$700,000      | add 3                    |
| [1.33]                   | (E) More than <del>\$1,500,000</del> \$2,000,000  | add 4                    |
| [1.33]                   | (F) More than <del>\$3,000,000</del> \$4,000,000  | add 5                    |
| [1.40]                   | (G) More than <del>\$5,000,000</del> \$7,000,000  | add 6                    |
| [1.58]                   | (H) More than <del>\$9,500,000</del> \$15,000,000 | add 7.                   |

\* \* \*

**§5E1.2. Fines for Individual Defendants**

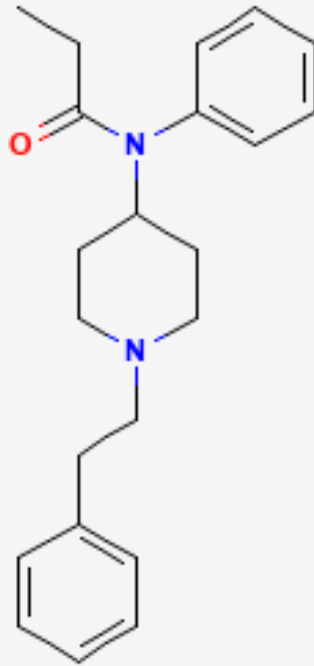
\* \* \*

- (c) (1) The minimum of the fine guideline range is the amount shown in column A of the table below.
- (2) Except as specified in paragraph (4) below, the maximum of the fine guideline range is the amount shown in column B of the table below.

(3) FINE TABLE

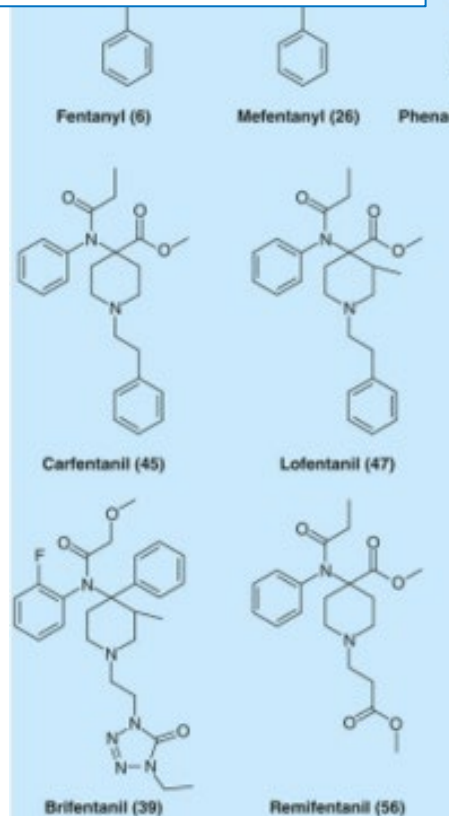
| [MULTIPLIER USED] | OFFENSE LEVEL | A MINIMUM        | B MAXIMUM          |
|-------------------|---------------|------------------|--------------------|
| [1.50, 1.58]      | 3 and below   | \$200\$300       | \$9,500\$15,000    |
| [1.40, 1.58]      | 4-5           | \$500\$700       | \$9,500\$15,000    |
| [1.50, 1.58]      | 6-7           | \$1,000\$1,500   | \$9,500\$15,000    |
| [1.25, 1.25]      | 8-9           | \$2,000\$2,500   | \$20,000\$25,000   |
| [1.38, 1.38]      | 10-11         | \$4,000\$5,500   | \$40,000\$55,000   |
| [1.36, 1.36]      | 12-13         | \$5,500\$7,500   | \$55,000\$75,000   |
| [1.33, 1.33]      | 14-15         | \$7,500\$10,000  | \$75,000\$100,000  |
| [1.50, 1.58]      | 16-17         | \$10,000\$15,000 | \$95,000\$150,000  |
| [1.50, 1.50]      | 18-19         | \$10,000\$15,000 | \$100,000\$150,000 |
| [1.33, 1.33]      | 20-22         | \$15,000\$20,000 | \$150,000\$200,000 |
| [1.25, 1.25]      | 23-25         | \$20,000\$25,000 | \$200,000\$250,000 |
| [1.40, 1.40]      | 26-28         | \$25,000\$35,000 | \$250,000\$350,000 |
| [1.33, 1.33]      | 29-31         | \$30,000\$40,000 | \$300,000\$400,000 |
| [1.43, 1.43]      | 32-34         | \$35,000\$50,000 | \$350,000\$500,000 |
| [1.38, 1.38]      | 35-37         | \$40,000\$55,000 | \$400,000\$550,000 |
| [1.40, 1.40]      | 38 and above  | \$50,000\$70,000 | \$500,000\$700,000 |

# #3 "Fentanyl related substance"



## Fentanyl Analogue

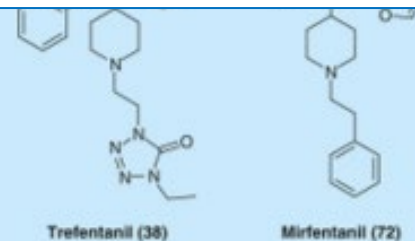
Similar chemical structure to fentanyl



## Fentanyl Related Substance

Structurally related to fentanyl by 1 or more listed modifications

- (A) By replacement of the phenyl portion of the phenethyl group by any monocycle, whether or not further substituted in or on the monocycle.
- (B) By substitution in or on the phenethyl group with alkyl, alkenyl, alkoxy, hydroxyl, halo, haloalkyl, amino, or nitro groups.
- (C) By substitution in or on the piperidine ring with alkyl, alkenyl, alkoxy, ester, ether, hydroxyl, halo, haloalkyl, amino, or nitro groups.
- (D) By replacement of the aniline ring with any aromatic monocycle whether or not further substituted in or on the aromatic monocycle.
- (E) By replacement of the N-propionyl group with another acyl group.



### (c) DRUG QUANTITY TABLE

| CONTROLLED SUBSTANCES AND QUANTITY*  | BASE OFFENSE LEVEL |
|--|--------------------|
| (1) <ul style="list-style-type: none"><li>● 90 KG or more of Heroin;</li><li>● 450 KG or more of Cocaine;</li><li>● 25.2 KG or more of Cocaine Base;</li><li>● 90 KG or more of PCP, or 9 KG or more of PCP (actual);</li><li>● 45 KG or more of Methamphetamine, or<br/>4.5 KG or more of Methamphetamine (actual), or<br/>4.5 KG or more of "Ice";</li><li>● 45 KG or more of Amphetamine, or<br/>4.5 KG or more of Amphetamine (actual);</li><li>● 900 G or more of LSD;</li><li>● 36 KG or more of Fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] Propanamide);</li><li>● 9 KG or more of a Fentanyl Analogue;</li><li>● 9 KG or more of a Fentanyl-Related Substance;</li><li>● 90,000 KG or more of Marihuana;</li><li>● 18,000 KG or more of Hashish;</li><li>● 1,800 KG or more of Hashish Oil;</li><li>● 90,000,000 units or more of Ketamine;</li><li>● 90,000,000 units or more of Schedule I or II Depressants;</li><li>● 5,625,000 units or more of Flunitrazepam;</li><li>● 90,000 KG or more of <i>Converted Drug Weight</i>.</li></ul> | <b>Level 38</b>    |



**\*Notes to Drug Quantity Table:**

\* \* \*

(K) The term “*Fentanyl-Related Substance*” is defined in 21 U.S.C. § 812(e). There is a rebuttable presumption that the base offense level specified in the Drug Quantity Table applies to fentanyl-related substances. However, if the defendant establishes either that the fentanyl-related substance (i) functions to block, diminish, or counteract the effect produced by fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide) or a fentanyl analogue, or (ii) is significantly less potent than fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), the court should instead determine the base offense level for the fentanyl-related substance using the converted drug weight of the most closely related controlled substance referenced in this guideline (as provided in Application Note 6 below).

What are FRS's that are significantly less potent than fentanyl?

What about acetyl fentanyl, butyryl fentanyl, meta-flourofentanyl, & 4'-flourofentanyl?

The New York Times



By [Jan Hoffman](#)

May 4, 2026

## *What to Know About Orphines, a New Class of Deadly Opioids*

May 4, 2026

## *What to Know About Class of Deadly Op*

The drugs are 10 times more deadly than fentanyl, showing up in street drugs in the Midwest. They will most likely spread to other parts of the country.

### Why did orphines start showing up in United States?

Orphines are among the synthetic opioids that started to appear in the street drug supply in the wake of global crackdowns on fentanyl.

In 2018, the Drug Enforcement Administration issued a temporary ban on all fentanyl-related substances, called analogs. That same year, an [article in The Journal of Medicinal Chemistry](#) addressed the challenge of developing opioids without toxic side effects and offered orphines as cautionary examples. It described them as dangerous, because they are so powerfully addictive and may affect breathing.

Researchers speculate that [rogue chemists](#), seeking illicit drugs that can evade international drug laws, may have been inspired by the article to develop orphines. By 2019, buporphine, an early orphine, was detected in Europe.

# #4 New ch. 5, part A language



## **PART A — ~~SENTENCING TABLE~~ DETERMINATION OF SENTENCING RANGE AND SENTENCING OPTIONS**

### **Introductory Commentary**

By statute, sentencing courts must consider and balance a broad range of factors when determining the appropriate sentence to impose in each individual case. Among these factors, courts are required to consider “all available sentencing options.” 18 U.S.C. § 3553(a)(3). Each of the available sentencing options—imprisonment, probation, and fines—serves a punitive function, and the sentencing court must determine the option, or combination of options, that best achieve a sentence “sufficient, but not greater than necessary to comply with the purposes set forth in [18 U.S.C. § 3553(a)(2)].” 18 U.S.C. § 3553(a).

Congress charged the Commission with promulgating guidelines for sentencing courts to use in determining “whether to impose a sentence to probation, a fine, or a term of imprisonment” (*see* 28 U.S.C. § 994(a)(1)(A)). The provisions within Chapter Five, in combination, guide all aspects of determining the appropriate sentence under the guidelines, including the initial determination of sentence type. By clearly delineating the sentencing options available under the guidelines, the Commission intends for Part A of this chapter to assist courts in making this critical decision.

## §5A1.1. Sentencing Table

The Sentencing Table is used to determine the applicable sentencing range and sentencing options based upon the guideline calculations made in Chapters Two through Four.

- (a) The Offense Level (1–43) forms the vertical axis of the Sentencing Table. The Criminal History Category (I–VI) forms the horizontal axis of the Table. The intersection of the Offense Level and Criminal History Category displays the Guideline Range in months of imprisonment. For example, the guideline range applicable to a defendant with an Offense Level of 15 and a Criminal History Category of III is 24–30 months of imprisonment. For purposes of the Sentencing Table, “*Life*” means life imprisonment.
- (b) The Sentencing Table is divided into Zones A, B, C, and D. Each zone provides for different sentencing options for the court’s consideration. Subject to any statutory limitations in an individual case (*see, e.g.*, §5B1.1(b) (statutory eligibility for probation), §§5G1.1, 5G1.2 (statutory minima and maxima)), the sentencing options in each zone are as follows:

(b) The Sentencing Table is divided into Zones A, B, C, and D. Each zone provides for different sentencing options for the court's consideration. Subject to any statutory limitations in an individual case (*see, e.g.*, §5B1.1(b) (statutory eligibility for probation), §§5G1.1, 5G1.2 (statutory minima and maxima)), the sentencing options in each zone are as follows:

| SENTENCING OPTIONS |  |
|--------------------|--|
| Zone A             | <ul style="list-style-type: none"> <li>• probation;</li> <li>• probation with a period of intermittent confinement, community confinement, or home detention;</li> <li>• a “split sentence” (<i>i.e.</i>, part of the term satisfied by imprisonment and the remainder satisfied by a term of supervised release with a condition that substitutes community confinement or home detention for imprisonment, according to the schedule in §5C1.1(e)); or</li> <li>• imprisonment.</li> </ul> <p><i>See</i> §5B1.1(a)(1); §5C1.1(a)–(b), (e); §5C1.1, comment. (n.2).</p> |
| Zone B             | <ul style="list-style-type: none"> <li>• probation with the minimum term of imprisonment satisfied by a period of intermittent confinement, community confinement, or home detention, according to the schedule in §5C1.1(e);</li> <li>• a “split sentence” (with at least one month satisfied by imprisonment); or</li> <li>• imprisonment.</li> </ul> <p><i>See</i> §5B1.1(a)(2); §5C1.1(c), (e); §5C1.1, comment. (n.3).</p>  |
| Zone C             | <ul style="list-style-type: none"> <li>• a “split sentence” (with at least one-half of the minimum term satisfied by imprisonment); or</li> <li>• imprisonment.</li> </ul> <p><i>See</i> §5C1.1(d), (e); §5C1.1, comment. (n.4).</p>   |
| Zone D             | <ul style="list-style-type: none"> <li>• imprisonment.</li> </ul> <p><i>See</i> §5C1.1(f).</p>   |

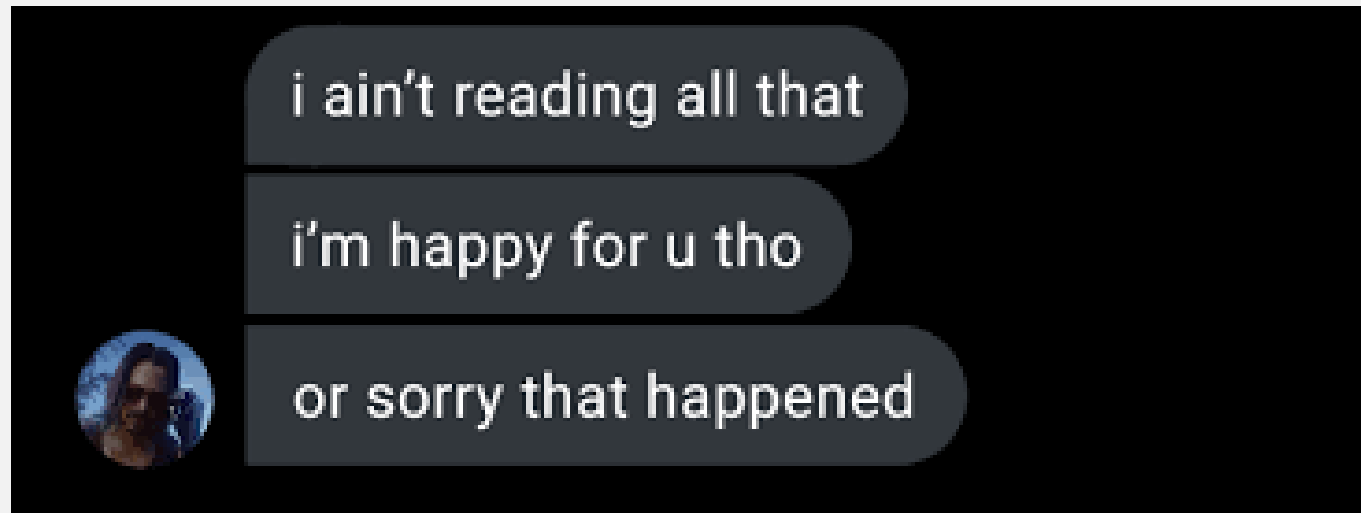
# #5 Deleting unused SOCs



## **B. Focus on grouping**

## §3D1.1. Procedure for Determining Offense Level on Multiple Counts





Brief breakdown of what we're doing:

- Identifying the highest offense level applicable to any count and using that as our sole offense level
  - For some counts, we will calculate in the aggregate
  - For some counts, we might add levels *before* deciding which offense level is highest

**STEP ZERO:**

Set aside counts  
with mandatory  
consecutive, pre-  
set lengths  
(1028A, 924(c))

**See new §3D1.1(e)**

Basically, nothing has  
changed for these,  
still see §5G1.2

**STEP ONE:** If multiple counts under any of these, calculate them in the aggregate under a single guideline

**This is new §3D1.1(a)**

Fraud

Drug trafficking

§2A3.5;  
§§2B1.1, 2B1.4, 2B1.5, 2B4.1, 2B5.1, 2B5.3, 2B6.1;  
§§2C1.1, 2C1.2, 2C1.8;  
§§2D1.1, 2D1.2, 2D1.5, 2D1.11, 2D1.13;  
§§2E4.1, 2E5.1;  
§§2G2.2, 2G3.1;  
§2K2.1;  
§§2L1.1, 2L2.1;  
§2N3.1;  
§2Q2.1;  
§2R1.1;  
§§2S1.1, 2S1.3;  
§§2T1.1, 2T1.4, 2T1.6, 2T1.7, 2T1.9, 2T2.1, 2T3.1.

Firearm offenses

Illegal reentry

CP non-production offenses

**STEP TWO:** For all  
other counts,  
calculate  
individually under  
the applicable GL

This is part of §3D1.1(b)(1) and (c)

Murder, assault, rape, obstruction, etc.

Robbery

all offenses in Chapter Two, Part A (except §2A3.5);  
§§2B2.1, 2B3.1, 2B3.2, 2B3.3;  
§2D2.3;  
§§2E1.3, 2E1.4, 2E2.1;  
§§2G1.1, 2G1.3, 2G2.1;  
§§2H1.1, 2H4.1;  
§2J1.2, 2J1.3;  
§2K1.4;  
§§2M3.9, 2M6.1;  
§2N1.1;  
§2Q1.4;  
§2X6.1.

CP production

VICAR

**STEP THREE:** If counts under any of these, determine whether additional levels must be added

**This is the rest of §3D1.1(b)(1)-(2)**

(b) (1) If there are multiple counts (A) to which the same guideline applies, (B) for which the applicable guideline is listed below, and (C) involving different victims or the same victim on different occasions, determine the offense level applicable to these counts by calculating the offense level for each count separately and applying the adjustment set forth in subsection (b)(2) to the count resulting in the highest offense level.

## Breaking down Step 3



## Breaking down step three



### So three questions

Multiple counts to which same guideline applies

The guideline is listed in §3D1.1(b)(1)

“involving different victims or the same victim on *different occasions*”



If “yes” to all, proceed with rest of step three

If no, move on

(2) The adjustment set forth in the table below shall be based on the number of counts covered by the guidelines listed in paragraph (1).

| NUMBER OF COUNTS COVERED BY<br>GUIDELINE LISTED IN PARAGRAPH (1) | INCREASE IN<br>OFFENSE LEVEL |
|--|------------------------------|
| (A) 2  | add 2 levels                 |
| (B) 3  | add 3 levels                 |
| (C) 4 or 5   | add 4 levels                 |
| (D) 6 or more  | add 5 levels.                |

# Breaking down Step 3



# The number of counts is per listed Guideline

all offenses in Chapter Two, Part A (except §2A3.5);  
§§2B2.1, 2B3.1, 2B3.2, 2B3.3;  
§2D2.3;  
§§2E1.3, 2E1.4, 2E2.1;  
§§2G1.1, 2G1.3, 2G2.1;  
§§2H1.1, 2H4.1;  
§2J1.2, 2J1.3;  
§2K1.4;  
§§2M3.9, 2M6.1;  
§2N1.1;  
§2Q1.4;  
§2X6.1.

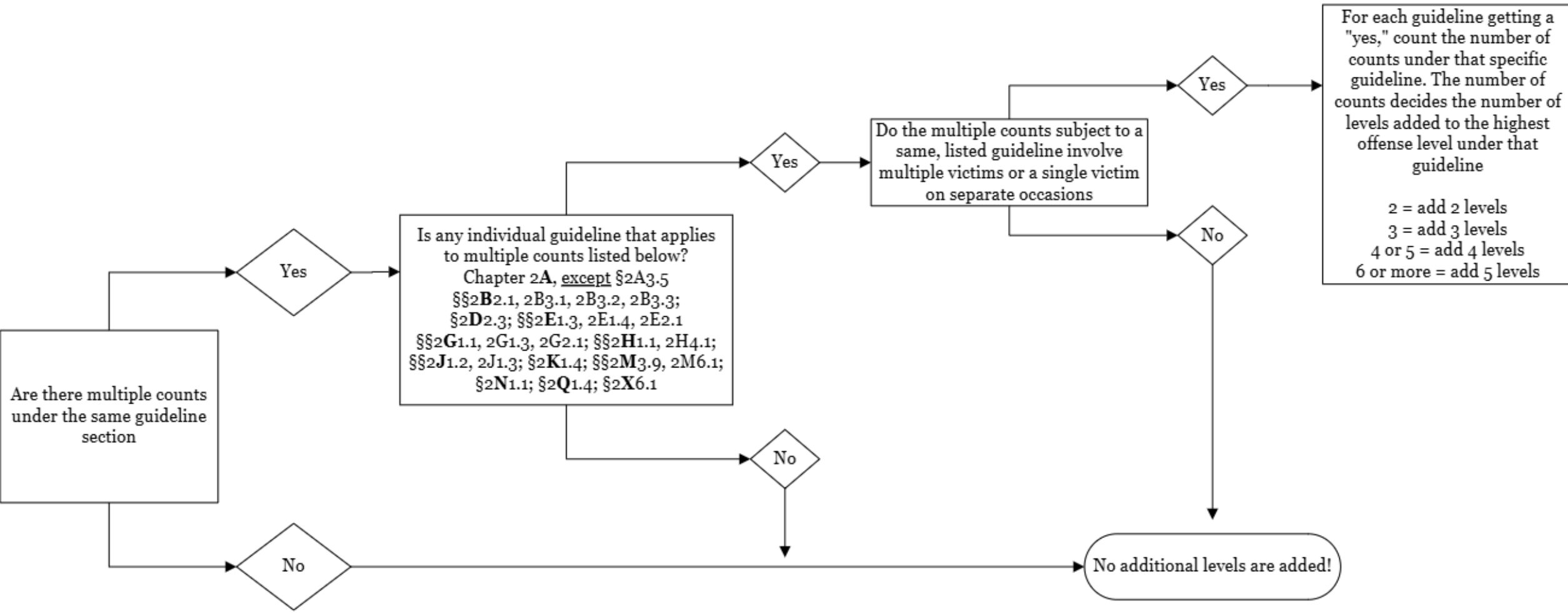
Example:

Three §2B2.1 & Two §2B3.1

- Add 3 to the highest §2B2.1
- And add 2 to the highest §2B3.1

(2) The adjustment set forth in the table below shall be based on the number of counts covered by the guidelines listed in paragraph (1).

| NUMBER OF COUNTS COVERED BY<br>GUIDELINE LISTED IN PARAGRAPH (1) | INCREASE IN<br>OFFENSE LEVEL |
|--|------------------------------|
| (A) 2  | add 2 levels                 |
| (B) 3  | add 3 levels                 |
| (C) 4 or 5   | add 4 levels                 |
| (D) 6 or more  | add 5 levels.                |



Are there multiple counts under the same guideline section

Yes

No

Is any individual guideline that applies to multiple counts listed below?  
Chapter 2A, except §2A3.5  
§§2B2.1, 2B3.1, 2B3.2, 2B3.3;  
§2D2.3; §§2E1.3, 2E1.4, 2E2.1  
§§2G1.1, 2G1.3, 2G2.1; §§2H1.1, 2H4.1;  
§§2J1.2, 2J1.3; §2K1.4; §§2M3.9, 2M6.1;  
§2N1.1; §2Q1.4; §2X6.1

Yes

No

Do the multiple counts subject to a same, listed guideline involve multiple victims or a single victim on separate occasions

Yes

No

For each guideline getting a "yes," count the number of counts under that specific guideline. The number of counts decides the number of levels added to the highest offense level under that guideline

2 = add 2 levels  
3 = add 3 levels  
4 or 5 = add 4 levels  
6 or more = add 5 levels

No additional levels are added!

**STEP FOUR:** Find which is the highest offense level; this level (whether or not extra levels) now applies to all counts

This is §3D1.1(d)

# **Example #1**

# Example #1

**Scenario:** Client is convicted of selling methamphetamine and fentanyl, robbing three rival sellers on separate occasions, and using a firearm in furtherance of one of the robberies. Each referenced conviction is a separate count.

## **Guidelines involved:**

- §2D1.1 meth count, and fentanyl count
- §2B3.1 robbery 1, robbery 2, robbery 3
- §2K2.4 for the 924(c)

**Step Zero:** set aside for later any mandatory length counts

- We have one here, §2K2.4 for the 924(c)

# Step One: calculate in aggregate?

§2A3.5;  
§§2B1.1, 2B1.4, 2B1.5, 2B4.1, 2B5.1, 2B5.3, 2B6.1;  
§§2C1.1, 2C1.2, 2C1.8;  
§§2D1.1, 2D1.2, 2D1.5, 2D1.11, 2D1.13;  
§§2E4.1, 2E5.1;  
§§2G2.2, 2G3.1;  
§2K2.1;  
§§2L1.1, 2L2.1;  
§2N3.1;  
§2Q2.1;  
§2R1.1;  
§§2S1.1, 2S1.3;  
§§2T1.1, 2T1.4, 2T1.6, 2T1.7, 2T1.9, 2T2.1, 2T3.1.

§2D1.1 is listed, so calculate both drug counts as a single calculation under §2D1.1. We'll say result = **28**

## **Step Two:** Calculate each remaining count individually

- Here, run the three separate robberies under §2B3.1 individually
- We'll say results:
  - Robbery 1 = 28
  - Robbery 2 = 22
  - Robbery 3 = 26

# Step Three: additional levels?

- Is there a Guideline that applies to more than one count?

- Yes

all offenses in Chapter Two, Part A (except §2A3.5);  
§§2B2.1, 2B3.1, 2B3.2, 2B3.3;  
§2D2.3;  
§§2E1.3, 2E1.4, 2E2.1;  
§§2G1.1, 2G1.3, 2G2.1;  
§§2H1.1, 2H4.1;  
§2J1.2, 2J1.3;  
§2K1.4;  
§§2M3.9, 2M6.1;  
§2N1.1;  
§2Q1.4;  
§2X6.1.

# Step Three: additional levels?

- Is the Guideline that covers multiple counts listed in §3D1.1(b)(1)?
  - Yes (see right)

all offenses in Chapter Two, Part A (except §2A3.5);  
§§2B2.1, 2B3.1, 2B3.2, 2B3.3;  
§2D2.3;  
§§2E1.3, 2E1.4, 2E2.1;  
§§2G1.1, 2G1.3, 2G2.1;  
§§2H1.1, 2H4.1;  
§2J1.2, 2J1.3;  
§2K1.4;  
§§2M3.9, 2M6.1;  
§2N1.1;  
§2Q1.4;  
§2X6.1.

# Step Three: additional levels?

- Do the multiple counts covered by that listed guideline involve different victims or one victim on separate occasions?
  - Yes. Different victim in each robbery


all offenses in Chapter Two, Part A (except §2A3.5);  
§§2B2.1, 2B3.1, 2B3.2, 2B3.3;  
§2D2.3;  
§§2E1.3, 2E1.4, 2E2.1;  
§§2G1.1, 2G1.3, 2G2.1;  
§§2H1.1, 2H4.1;  
§2J1.2, 2J1.3;  
§2K1.4;  
§§2M3.9, 2M6.1;  
§2N1.1;  
§2Q1.4;  
§2X6.1.

# Step Three: additional levels?

- Since we said yes to all three, the robbery counts receive extra levels
- Per §3D1.1(b)(2) chart, we add 3 levels to the highest scoring robbery (28)
  - Robbery Offense level = **31**

| NUMBER OF COUNTS COVERED BY<br>GUIDELINE LISTED IN PARAGRAPH (1) | INCREASE IN<br>OFFENSE LEVEL |
|--|------------------------------|
| (A) 2  | add 2 levels                 |
| (B) 3  | add 3 levels                 |
| (C) 4 or 5   | add 4 levels                 |
| (D) 6 or more  | add 5 levels.                |

# **Step Four: highest level controls (then add mandatory consecutive to Guideline range)**

- Our results were:
  - Drug Counts (1 & 2 aggregated)
    - Offense level = **28**
  - Robbery Counts
    - Offense level = **31** ← 
    - (28 highest individual + 3 levels per §3D1.1)
  - 924(c)
    - Mandatory term, consecutive to end

# Playing with Example 1 Facts

- Original scenario results
  - Drug counts aggregated: 28
  - Robbery counts after §3D1.1(b): 31
  - 924(c) added on to Guideline range
- What if robbery, after adjustment, was 27 instead of 31?
  - Offense level 28 because drug counts and highest controls
- What if original facts, but we eliminate the drug counts?
  - No change because 31 (robberies) was highest and controlled

## **Example #2**

**Count 2:**

Title 18 U.S.C. §§ 2251(a) & (e): Production of Child Pornography

**Count 5:**

Title 18 U.S.C. § 2252A(a)(5)(B): Possession of Child Pornography

**Count 7:**

Title 18 U.S.C. §§ 2251(a) & (e): Production of Child Pornography



# Step Two: calculate other counts

## Count 2: Production of Child Pornography

|     |  |           |
|-----|--|-----------|
| 40. | <b>Base Offense Level:</b> The guideline for a violation of 18 U.S.C. § 2251(a) is USSG §2G2.1. The base offense level is 32. USSG § 2G2.1(a).   | <u>32</u> |
| 41. | <b>Specific Offense Characteristics:</b> The offense involved a minor who had attained the age of twelve (12) years but not attained the age of sixteen (16) years, a two-level increase is warranted under USSG § 2G2.1(b)(1)(B) <sup>6</sup> .                             | <u>+2</u> |
| 42. | <b>Specific Offense Characteristics:</b> The offense involved the use of a computer or an interactive computer service to persuade, induce, entice, coerce a minor to engage in sexually explicit conduct, a two-level increase is warranted under USSG § 2G2.1(b)(6)(B)(i). | <u>+2</u> |
| 43. | <b>Victim Related Adjustment:</b> None.  | <u>0</u>  |
| 44. | <b>Adjustment for Role in the Offense:</b> None.   | <u>0</u>  |
| 45. | <b>Adjustment for Obstruction of Justice:</b> None.  | <u>0</u>  |
| 46. | <b>Adjusted Offense Level (Subtotal):</b>  | <u>36</u> |

## Count 7: Production of Child Pornography

|     |  |           |
|-----|--|-----------|
| 57. | <b>Base Offense Level:</b> The guideline for a violation of 18 U.S.C. § 2251(a) is USSG §2G2.1. The base offense level is 32. USSG §2G2.1(a).  | <u>32</u> |
| 58. | <b>Specific Offense Characteristics:</b> The offense involved a minor who had attained the age of twelve (12) years but not attained the age of sixteen (16) years, a two-level increase is warranted under USSG § 2G2.1(b)(1)(B) <sup>11</sup> .                            | <u>+2</u> |
| 59. | <b>Specific Offense Characteristics:</b> The offense involved the use of a computer or an interactive computer service to persuade, induce, entice, coerce a minor to engage in sexually explicit conduct, a two-level increase is warranted under USSG § 2G2.1(b)(6)(B)(i). | <u>+2</u> |
| 60. | <b>Victim Related Adjustment:</b> None.  | <u>0</u>  |
| 61. | <b>Adjustment for Role in the Offense:</b> None.   | <u>0</u>  |
| 62. | <b>Adjustment for Obstruction of Justice:</b> None.  | <u>0</u>  |
| 63. | <b>Adjusted Offense Level (Subtotal):</b>  | <u>36</u> |

# Step Three: additional levels?

Let's say: same victim, one produced April, one produced May of same year

| <b>Count 2: Production of Child Pornography</b>  |           |
|--|-----------|
| 40. <b>Base Offense Level:</b> The guideline for a violation of 18 U.S.C. § 2251(a) is USSG §2G2.1. The base offense level is 32. USSG § 2G2.1(a).   | <u>32</u> |
| 41. <b>Specific Offense Characteristics:</b> The offense involved a minor who had attained the age of twelve (12) years but not attained the age of sixteen (16) years, a two-level increase is warranted under USSG § 2G2.1(b)(1)(B) <sup>6</sup> .                             | <u>+2</u> |
| 42. <b>Specific Offense Characteristics:</b> The offense involved the use of a computer or an interactive computer service to persuade, induce, entice, coerce a minor to engage in sexually explicit conduct, a two-level increase is warranted under USSG § 2G2.1(b)(6)(B)(i). | <u>+2</u> |
| 43. <b>Victim Related Adjustment:</b> None.  | <u>0</u>  |
| 44. <b>Adjustment for Role in the Offense:</b> None.   | <u>0</u>  |
| 45. <b>Adjustment for Obstruction of Justice:</b> None.  | <u>0</u>  |
| 46. <b>Adjusted Offense Level (Subtotal):</b>  | <u>36</u> |

| <b>Count 7: Production of Child Pornography</b>  |           |
|--|-----------|
| 57. <b>Base Offense Level:</b> The guideline for a violation of 18 U.S.C. § 2251(a) is USSG §2G2.1. The base offense level is 32. USSG §2G2.1(a).  | <u>32</u> |
| 58. <b>Specific Offense Characteristics:</b> The offense involved a minor who had attained the age of twelve (12) years but not attained the age of sixteen (16) years, a two-level increase is warranted under USSG § 2G2.1(b)(1)(B) <sup>11</sup> .                            | <u>+2</u> |
| 59. <b>Specific Offense Characteristics:</b> The offense involved the use of a computer or an interactive computer service to persuade, induce, entice, coerce a minor to engage in sexually explicit conduct, a two-level increase is warranted under USSG § 2G2.1(b)(6)(B)(i). | <u>+2</u> |
| 60. <b>Victim Related Adjustment:</b> None.  | <u>0</u>  |
| 61. <b>Adjustment for Role in the Offense:</b> None.   | <u>0</u>  |
| 62. <b>Adjustment for Obstruction of Justice:</b> None.  | <u>0</u>  |
| 63. <b>Adjusted Offense Level (Subtotal):</b>  | <u>36</u> |

all offenses in Chapter Two, Part A (except §2A3.5);  
§§2B2.1, 2B3.1, 2B3.2, 2B3.3;  
§2D2.3;  
§§2E1.3, 2E1.4, 2E2.1;  
§§2G1.1, 2G1.3, 2G2.1;  
§§2H1.1, 2H4.1;  
§2J1.2, 2J1.3;  
§2K1.4;  
§§2M3.9, 2M6.1;  
§2N1.1;  
§2Q1.4;  
§2X6.1.

# Step Three: additional levels?

**Count 2: Production of Child Pornography**

|  |           |
|--|-----------|
| 40. <b>Base Offense Level:</b> The guideline for a violation of 18 U.S.C. § 2251(a) is USSG §2G2.1. The base offense level is 32. USSG § 2G2.1(a).   | <u>32</u> |
| 41. <b>Specific Offense Characteristics:</b> The offense involved a minor who had attained the age of twelve (12) years but not attained the age of sixteen (16) years, a two-level increase is warranted under USSG § 2G2.1(b)(1)(B) <sup>6</sup> .                             | <u>+2</u> |
| 42. <b>Specific Offense Characteristics:</b> The offense involved the use of a computer or an interactive computer service to persuade, induce, entice, coerce a minor to engage in sexually explicit conduct, a two-level increase is warranted under USSG § 2G2.1(b)(6)(B)(i). | <u>+2</u> |
| 43. <b>Victim Related Adjustment:</b> None.  | <u>0</u>  |
| 44. <b>Adjustment for Role in the Offense:</b> None.   | <u>0</u>  |
| 45. <b>Adjustment for Obstruction of Justice:</b> None.  | <u>0</u>  |
| 46. <b>Adjusted Offense Level (Subtotal):</b>  | <u>36</u> |

**Count 7: Production of Child Pornography**

|  |           |
|--|-----------|
| 57. <b>Base Offense Level:</b> The guideline for a violation of 18 U.S.C. § 2251(a) is USSG §2G2.1. The base offense level is 32. USSG §2G2.1(a).  | <u>32</u> |
| 58. <b>Specific Offense Characteristics:</b> The offense involved a minor who had attained the age of twelve (12) years but not attained the age of sixteen (16) years, a two-level increase is warranted under USSG § 2G2.1(b)(1)(B) <sup>11</sup> .                            | <u>+2</u> |
| 59. <b>Specific Offense Characteristics:</b> The offense involved the use of a computer or an interactive computer service to persuade, induce, entice, coerce a minor to engage in sexually explicit conduct, a two-level increase is warranted under USSG § 2G2.1(b)(6)(B)(i). | <u>+2</u> |
| 60. <b>Victim Related Adjustment:</b> None.  | <u>0</u>  |
| 61. <b>Adjustment for Role in the Offense:</b> None.   | <u>0</u>  |
| 62. <b>Adjustment for Obstruction of Justice:</b> None.  | <u>0</u>  |
| 63. <b>Adjusted Offense Level (Subtotal):</b>  | <u>36</u> |

| NUMBER OF COUNTS COVERED BY<br>GUIDELINE LISTED IN PARAGRAPH (1) | INCREASE IN<br>OFFENSE LEVEL |
|--|------------------------------|
| (A) 2  | add 2 levels                 |
| (B) 3  | add 3 levels                 |
| (C) 4 or 5   | add 4 levels                 |
| (D) 6 or more  | add 5 levels.                |

# Step Four: highest level controls

**Count 2: Production of Child Pornography**

40. **Base Offense Level:** The guideline for §2G2.1. The base offense level is 32. Units are assigned pursuant to USSG §3D1.4(a), (b) and (c). One unit is assigned to the group with the highest offense level. One additional unit is assigned for each group that is equally serious or from 1 to 4 levels less serious. One-half unit is assigned to any group that is 5 to 8 levels less serious than the highest offense level. Any groups that are 9 or more levels less serious than the highest offense level are disregarded.

41. **Specific Offense Characteristics:** The offense is committed by a person under the age of twelve (12) years but not at least 10 years of age. A level increase is warranted under USSG §2G2.1(b)(6)(B)(i).

42. **Specific Offense Characteristics:** The offense is committed by a person who provides an interactive computer service to permit or facilitate the individual to engage in sexually explicit conduct, at § 2G2.1(b)(6)(B)(i).

43. **Victim Related Adjustment:** None.

44. **Adjustment for Role in the Offense:** None.

45. **Adjustment for Obstruction of Justice:** None.

46. **Adjusted Offense Level (Subtotal):** 32

**Count 7: Production of Child Pornography**

57. **Base Offense Level:** The guideline for §2G2.1. The base offense level is 32. Units are assigned pursuant to USSG §3D1.4(a), (b) and (c). One unit is assigned to the group with the highest offense level. One additional unit is assigned for each group that is equally serious or from 1 to 4 levels less serious. One-half unit is assigned to any group that is 5 to 8 levels less serious than the highest offense level. Any groups that are 9 or more levels less serious than the highest offense level are disregarded.

58. **Specific Offense Characteristics:** The offense is committed by a person under the age of twelve (12) years but not at least 10 years of age. A level increase is warranted under USSG §2G2.1(b)(6)(B)(i).

59. **Specific Offense Characteristics:** The offense is committed by a person who provides an interactive computer service to permit or facilitate the individual to engage in sexually explicit conduct, at § 2G2.1(b)(6)(B)(i).

60. **Victim Related Adjustment:** None.

61. **Adjustment for Role in the Offense:** None.

62. **Adjustment for Obstruction of Justice:** None.

63. **Adjusted Offense Level (Subtotal):** 32

64. **Multiple Count Adjustment:** Units are assigned pursuant to USSG §3D1.4(a), (b) and (c). One unit is assigned to the group with the highest offense level. One additional unit is assigned for each group that is equally serious or from 1 to 4 levels less serious. One-half unit is assigned to any group that is 5 to 8 levels less serious than the highest offense level. Any groups that are 9 or more levels less serious than the highest offense level are disregarded.

| <u>Group/Count</u>           | <u>Adjusted Offense Level</u> |
|------------------------------|-------------------------------|
| Count 2                      | 32                            |
| Count 5                      | 32                            |
| Count 7                      | 32                            |
| <b>Total Number of Units</b> | <b>3.0</b>                    |

**1 LEVEL LOWER!**

65. **Greater of the Adjusted Offense Level and the Base Offense Level:** 36
66. **Increase in Offense Level:** The offense level is increased pursuant to the number of units assigned by the amount indicated in the table at USSG §3D1.4. +3
67. **Combined Adjusted Offense Level:** The Combined Adjusted Offense Level is determined by taking the offense level applicable to the Group with the highest offense level and increasing the offense level by the amount indicated in the table at USSG §3D1.4. 39

# **Example #3**

Bank Robbery, in violation of Title 18, United States Code, Sections 2113(a) and (d), a Class B Felony

Possession of a Firearm in Connection to a Crime of Violence, in violation of Title 18 U.S.C. § 924(c)(1)(B)(i), a Class A Felony



Escape, in violation of Title 18, United States Code, Section 751, a Class D felony

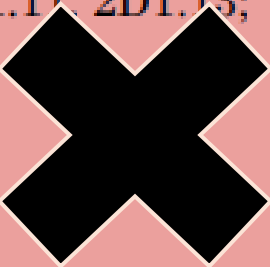


# Step One: calculate in aggregate?

Bank Robbery, in violation of 18 U.S.C. § 2113(a) and (c), a Class B Felony **2B3.1**

Escape, in violation of Title 18, United States Code, Section 751, a Class D felony **2P1.1**

§2A3.5;  
 §§2B1.1, 2B1.4, 2B1.5, 2B4.1, 2B5.1, 2B5.3, 2B6.1;  
 §§2C1.1, 2C1.2, 2C1.8;  
 §§2D1.1, 2D1.2, 2D1.5, 2D1.11, 2D1.13;  
 §§2E4.1, 2E5.1;  
 §§2G2.2, 2G3.1;  
 §2K2.1;  
 §§2L1.1, 2L2.1;  
 §2N3.1;  
 §2Q2.1;  
 §2R1.1;  
 §§2S1.1, 2S1.3;  
 §§2T1.1, 2T1.4, 2T1.6, 2T1.7, 2T1.9, 2T2.1, 2T3.1.



# Step Two: calculate each count

## Count One - Bank Robbery

20. **Base Offense Level:** The United States Sentencing Commission Guideline for a violation of 18 U.S.C. §§2113(a) and (d) is found in USSG §2B3.1(a) and calls for a base offense level of 20. 20
21. **Specific Offense Characteristic:** Since the property of a financial institution was taken during the instant offense, the base offense level is increased by two levels, pursuant to USSG §2B3.1(b)(1). +2
22. **Victim-Related Adjustments:** None. 0
23. **Adjustments for Role in the Offense:** None. 0
24. **Adjustment for Obstruction of Justice:** None. 0
25. **Adjusted Offense Level (Subtotal)** 22

## Count Five - Escape

27. **Base Offense Level:** The United States Sentencing Commission Guideline for violation of 18 U.S.C. § 751(a) is found in USSG §2P1.1(a)(1) and calls for a base offense level of 13, if the defendant was in custody or confinement by virtue of an arrest on a charge of a felony, or conviction of any offense. In this case, the defendant was being housed at the Greene County Detention Center while in the custody of the Attorney General on the charge of bank robbery. 13
28. **Specific Offense Characteristic:** Pursuant to USSG §2P1.1(b)(1), if the use or the threat of force against any person was involved, increase the offense level by five levels. In the present case, during the defendant's escape, he assaulted Deputy McCauley, causing serious bodily injury which required stitches. +5
29. **Victim-Related Adjustments:** Pursuant to USSG §3A1.2 (c)(2), if, in a manner creating a substantial risk of serious bodily injury, the defendant knowing or having reasonable cause to believe that a person was a prison official, assaulted such official while the defendant was in the custody or control of a prison or other correctional facility, increase by six levels. +6
30. **Adjustments for Role in the Offense:** None. 0
31. **Adjustment for Obstruction of Justice:** None. 0
32. **Adjusted Offense Level (Subtotal):** 24

# Step Three: additional levels?

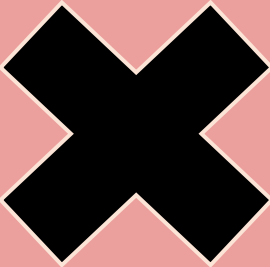
## Count One - Bank Robbery

20. **Base Offense Level:** The United States Sentencing Commission Guideline for a violation of 18 U.S.C. §§2113(a) and (d) is found in USSG §2B3.1(a) and calls for a base offense level of 20. 20
21. **Specific Offense Characteristic:** Since the property of a financial institution was taken during the instant offense, the base offense level is increased by two levels, pursuant to USSG §2B3.1(b)(1). +2
22. **Victim-Related Adjustments:** None. 0
23. **Adjustments for Role in the Offense:** None. 0
24. **Adjustment for Obstruction of Justice:** None. 0
25. **Adjusted Offense Level (Subtotal)** 22

## Count Five - Escape

27. **Base Offense Level:** The United States Sentencing Commission Guideline for violation of 18 U.S.C. § 751(a) is found in USSG §2P1.1(a)(1) and calls for a base offense level of 13, if the defendant was in custody or confinement by virtue of an arrest on a charge of a felony, or conviction of any offense. In this case, the defendant was being housed at the Greene County Detention Center while in the custody of the Attorney General on the charge of bank robbery. 13
28. **Specific Offense Characteristic:** Pursuant to USSG §2P1.1(b)(1), if the use or the threat of force against any person was involved, increase the offense level by five levels. In the present case, during the defendant's escape, he assaulted Deputy McCauley, causing serious bodily injury which required stitches. +5
29. **Victim-Related Adjustments:** Pursuant to USSG §3A1.2 (c)(2), if, in a manner creating a substantial risk of serious bodily injury, the defendant knowing or having reasonable cause to believe that a person was a prison official, assaulted such official while the defendant was in the custody or control of a prison or other correctional facility, increase by six levels. +6
30. **Adjustments for Role in the Offense:** None. 0
31. **Adjustment for Obstruction of Justice:** None. 0
32. **Adjusted Offense Level (Subtotal):** 24

all offenses in Chapter Two, Part A (except §2A3.5);  
§§2B2.1, 2B3.1, 2B3.2, 2B3.3;  
§2D2.3;  
§§2E1.3, 2E1.4, 2E2.1;  
§§2G1.1, 2G1.3, 2G2.1;  
§§2H1.1, 2H4.1;  
§2J1.2, 2J1.3;  
§2K1.4;  
§§2M3.9, 2M6.1;  
§2N1.1;  
§2Q1.4;  
§2X6.1.



# Step Four: highest level controls

## Count One - Bank Robbery

- 20. **Base Offense Level:** The United States Code provides for a base offense level of 20 for a violation of 18 U.S.C. §§2113(a) and (b) and a base offense level of 20.
- 21. **Specific Offense Characteristic:** Since the defendant was armed during the instant offense, the base offense level is increased by two under USSG §2B3.1(b)(1).
- 22. **Victim-Related Adjustments:** None.
- 23. **Adjustments for Role in the Offense:** None.
- 24. **Adjustment for Obstruction of Justice:** None.
- 25. **Adjusted Offense Level (Subtotal):** 22

| <u>Multiple-Count Adjustment</u> (See § 3D1.4) |  | <u>Units</u> |
|--|--|--------------|
| 33.  | Adjusted Offense Level for Count One         | <u>22</u>    |
| 34.  | Adjusted Offense Level for Count Two         | <u>24</u>    |
| 35.  | Total Number of Units                        | <u>2</u>     |
| 36.  | Greater Adjustment                           | <u>24</u>    |
| 37.  | Increase                                     | <u>2</u>     |
| 38.  | Combine                                      | <u>26</u>    |
| 39.  | Adjustment for Obstruction of Justice: None. | <u>0</u>     |
| 40.  | Adjusted Offense Level:                      | <u>26</u>    |

**2 LEVELS LOWER!**

...ing Commission Guideline for §2P1.1(a)(1) and calls for a base offense level of 20 for confinement by virtue of an arrest. In this case, the defendant was arrested while in the custody of the ... 13

... §2P1.1(b)(1), if the use or the possession of a firearm to increase the offense level by five levels. In this case, the defendant escaped, he assaulted Deputy ... +5

... §3A1.2 (c)(2), if, in a manner that increases the offense level by two levels, the defendant knowing or having reason to believe that such official is a law enforcement official, assaulted such official while in the custody of a prison or other correctional facility. ... +6

... 0

- 31. Adjustment for Obstruction of Justice: None.
- 32. Adjusted Offense Level (Subtotal):

**24**

# How 3D1.1 structures this

1. Calculate offense levels for counts coming under guidelines that aggregate multiple counts.
2. Calculate offense levels separately for counts coming under guidelines that might trigger extra levels.
  - Determine whether any of those counts actually trigger extra levels, and apply them
3. Calculate offense levels separately for all other counts
4. Find which of these is the highest offense level, which becomes the offense level applicable to all counts.

**Fighting the guidelines  
that didn't change**



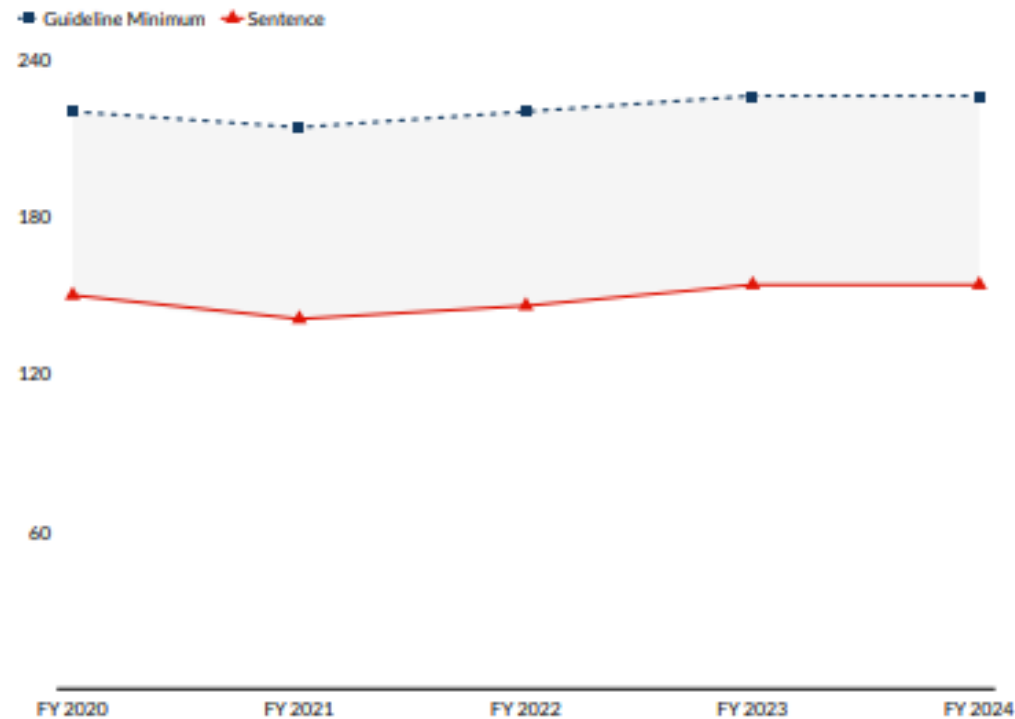
# QuickFacts

## Career Offenders

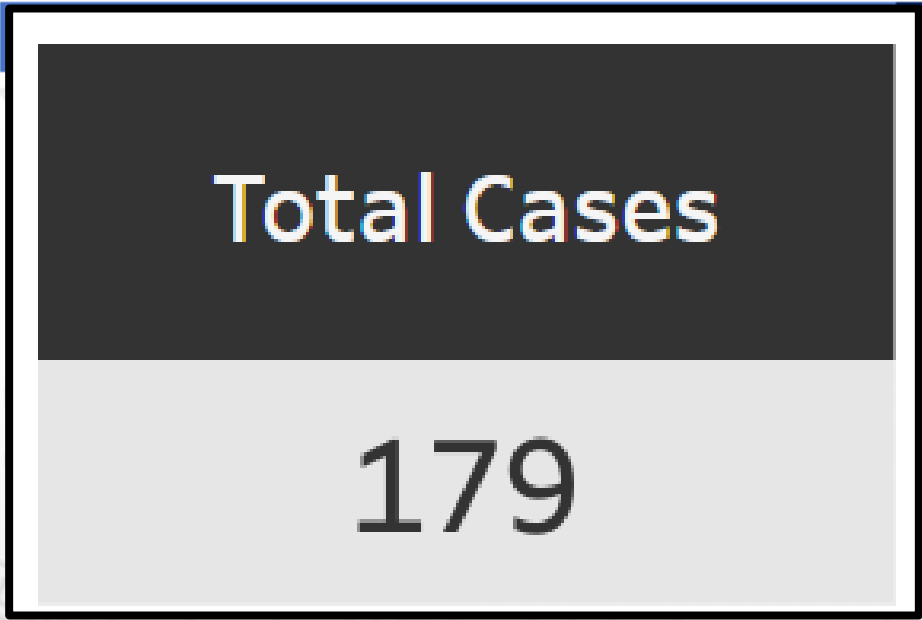
### What is a Career Offender?

A "career offender" is someone who commits a crime of violence or a controlled substance offense after two prior felony convictions for those crimes. The sentencing guidelines assign all "career offenders" to Criminal History Category (CHC) VI and to offense levels at or near the statutory maximum penalty of the offense of conviction.<sup>1</sup>

### Average Guideline Minimum and Average Sentence (months)

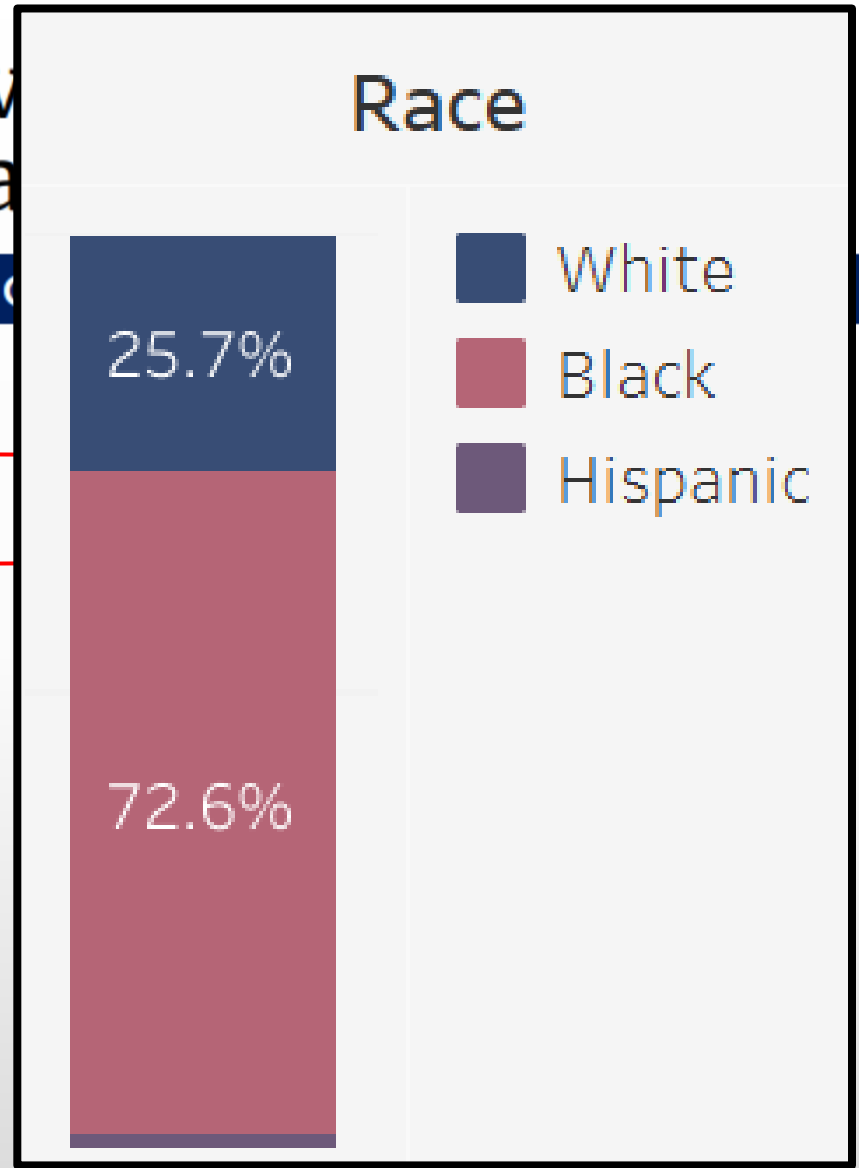


# Demographics of Individuals Fiscal Year



**Citizenship**  
U.S. Citizen

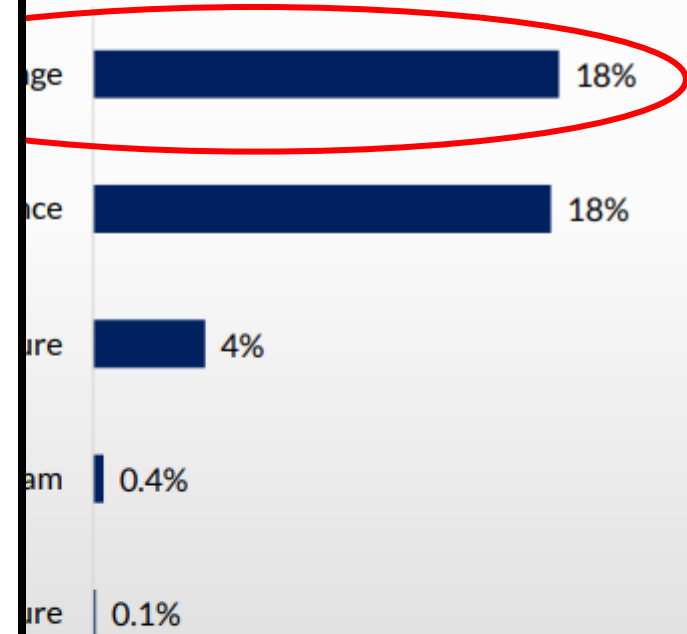
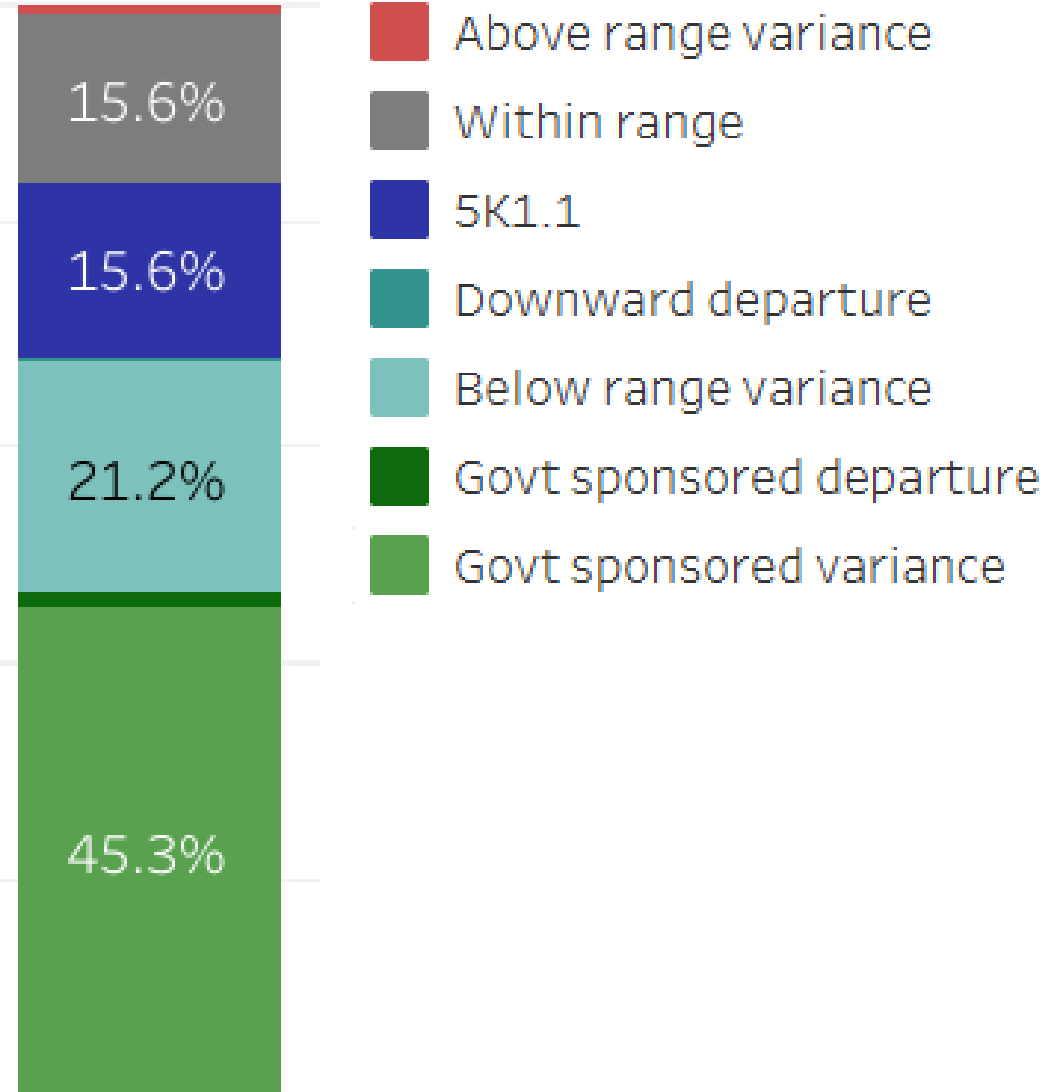
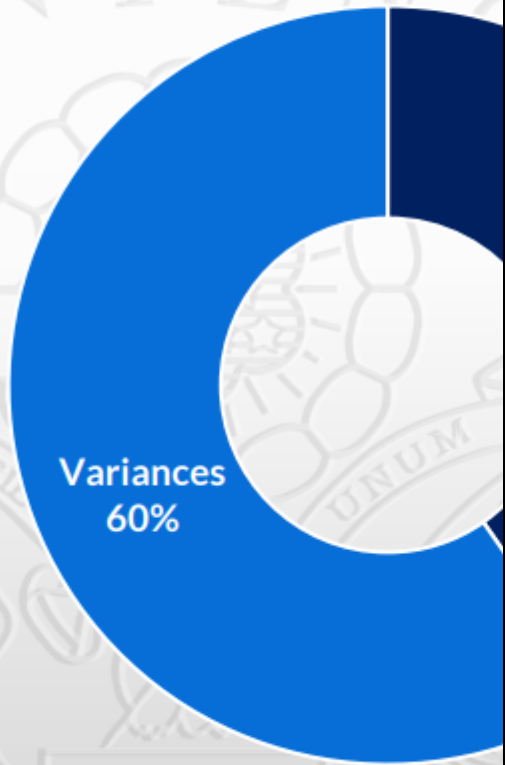
§4B1.1 C



# Sentence Impact Individuals S

## Placement w/r/t Guidelines

# Line Range for Career Offender



# **Commissioners know this guideline is broken**

- Lowest compliance rates among all guidelines
- The Commission has acknowledged that it creates a serious, unwarranted racial disparity
- Four proposals in the last five amendment cycles
- Judges are demanding an end to the categorical approach but, given actual sentences, Commissioners are wary to act in ways that would expand the guideline
- Last two proposals combined eliminating the categorical approach with some genuinely great stuff

**Federal Public and Community Defenders  
Comment on Career Offender and Circuit Conflicts  
(January Proposals 2 and 3)**

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Post-*Booker*, judges have no need for vitriol. Now, they can impose a well-below-guideline sentence. And that is precisely what judges have done, in increasing numbers, for 20+ years.<sup>10</sup> But *Booker* does not nullify the career-offender guideline's pernicious influence: the career-offender sentencing range still has a powerful anchoring effect.<sup>11</sup> And in some districts, even today, judges mostly impose career-offender-range sentences, causing disparities and resulting in life-shatteringly-long prison sentences for unfortunate individuals—mostly, Black men—in those districts.<sup>12</sup>

## 2026 Defender Comments on January Proposed Amendments

*Submitted by SRC Team on Monday March 30, 2026*

The Federal Public & Community Defenders submitted to the Sentencing Commission our comments and supplemental comments regarding the Commission's proposed January 2026 Amendments

ATTACHMENT(S)

 [Tranche 2 initial comments/witness statements on sentencing options, career offender, circuit splits, and human smuggling](#)

 [Tranche 2 supplemental comments](#)

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[Alternatives](#) [Categorical Approach](#) [Circuit split](#) [Congressional Directives](#) [Data](#) [Guidelines](#) [Immigration](#) [Mitigation](#) [Probation](#) [Race](#) [Sentencing Commission](#)

## 2026 Defender Comments on December Proposed Amendments

*Submitted by SRC Team on Monday March 30, 2026*

The Federal Public & Community Defenders submitted to the Sentencing Commission our initial and reply comments regarding the Commission's proposed December 2025 Amendments.

ATTACHMENT(S)



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- Bates - acquittal where two burglaries days apart and two assaults days apart
- Bradshaw - acquittal where drug deliveries separated by months and years
- Crews - acquittal where three drug deals over three months
- Hansel - won after blocking gov evidence
- Martin - won order granting acquittal evidence insufficient
- Pennington - acquittal for multiple controlled buys over months
- Sychowski - acquittal where 3 diff offenses occurring together in same place
- Williams - acquittal where crimes spanning decades
- Willis - acquittal where two robberies of same location

# SRC Zoom office hours

**B** *I* U  

Unique Zoom links will go out 24-48 hours before each date

**\*\*\* Note: Office Hours is a resource only for federal defenders and CJA-appointed attorneys**

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- June 4, 2026
- June 18, 2026
- July 2, 2026
- July 16, 2026
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Max Wolson  
480-489-1187

