

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 22-20191CR-WILLIAMS

UNITED STATES OF AMERICA,

Plaintiff,

v.

KADEEM STEPHAN MAYNARD,

Defendant.

_____ /

OBJECTIONS TO PRE-SENTENCE INVESTIGATION REPORT

Defendant, **KADEEM STEPHAN MAYNARD**, pursuant to Rule 32, Federal Rules of Criminal Procedure, files these Objections to Pre-Sentence Investigation Report (P.S.I.), and in support thereof asserts:

Legal

(1)

Mr. Maynard objects to the Pre-Sentence Investigation Report's failure to recommend a minor role reduction pursuant to §3B1.2, U.S.S.G. (PSI, ¶23). In this case, Mr. Maynard's role in the charged offense was clearly minor. Mr. Maynard spoke to the CI and provided information to his mother.

Mr. Maynard made an introduction of the CI to his mother, who worked as the managing director of the BVI Ports Authority. Mr. Maynard did not falsify paperwork at the BVI port. He did not have the ability to arrange for the preparation of paperwork at the port. Mr. Maynard did not speak to anyone in the port to arrange for the transshipment of narcotics. Mr. Maynard did not negotiate the CI's access to the BVI port. Mr. Maynard did not bribe anyone. Mr. Maynard neither negotiated nor calculated the amount of money to be paid for the 3,000-kilo loads. Mr. Maynard did not travel to Miami to collect any money from the CI and was not shown any money in Miami. When detained at the U.S. Virgin Islands, Mr. Maynard took no action to evade arrest. Mr. Maynard had no participation in the funding for the transportation of contraband and had no knowledge of the person or persons to whom the drugs were to be delivered.

U.S. Probation concedes the Government agrees to a minor role reduction [See DE 103: §7(b)] but disagrees with the parties' joint recommendation. (PSI, §74). The defense notes the Government and its agents and the defense, not U.S. Probation, are in the best position to assess and recommend Mr. Maynard's role in this case. U.S. Probation alludes to "side-deals" between Mr. Maynard and the CI. This was *not* included in the

Factual Proffer accepted by this Court and should not be considered. [DE 104]. Based on the foregoing, Mr. Maynard submits that he qualifies for a minor role adjustment. Mr. Maynard submits that should this Court grant a minor role adjustment his base offense level will be reduced from 38 to 34. §2D1.1(a)(5), U.S.S.G. Should the Court decline to impose a §3B1.2 minor role adjustment, Mr. Maynard submits that his relatively minor involvement in the offense nonetheless justifies a variance from the sentencing guidelines range.

(2)

Mr. Maynard objects to the Pre-Sentence Investigation Report calculation of Guideline Offense Level of 33 and Guideline Imprisonment Range of 135 to 168 months. (PSI, §74). Mr. Maynard submits that based on a minor role adjustment ($38-4=34$), a three-level reduction for acceptance of responsibility ($34-3=31$), a two-level reduction contemplated under §2D1.1(b)(18) ($31-2=29$), and an unopposed variance pursuant to a two-level reduction contemplated in §4C1.1 [PSI, §76] ($29-2=27$), the Guidelines Level should be Level 27, Range 70-87 months.

(3)

Sentencing Considerations-§3553

This Court may then consider the applicable factors listed in 18 U.S.C.

Section 3553(a), which are:

1) the nature and circumstances of the offense and the history and characteristics of the defendant; 2) the need to reflect the seriousness of the offense, to promote respect for the law, and to provide just punishment for the offense; 3) the need for deterrence; 4) the need to protect the public; 5) the need to provide the defendant with educational or vocational training or medical care; 6) the kinds of sentences available; 7) the sentencing guidelines range; 8) pertinent policy statements of the Sentencing Commission; 9) the need to avoid unwarranted sentencing disparities; and 10) the need to provide restitution to victims.

Mr. Maynard submits that this Court should consider a variance from the sentencing guidelines range and impose a lower sentence in this cause based on the factors listed in §3553(a).

(I)

The nature and circumstances of the offense

The nature and circumstances of the offense warrant a substantial lenient sentence. Mr. Maynard had a relatively minor involvement in the offense as noted above. It should be noted, of course, that no narcotics were ever transported for shipment and no drugs entered the United States.

(II)

Defendant's history and characteristics

Mr. Maynard submits that his personal history and characteristics warrant a sentencing variance. The defense notes the following:

-Mr. Maynard has been incarcerated since April, 2022. He has not incurred any disciplinary action.

-Mr. Maynard has zero criminal history points. He has no prior arrest record. [PSI, ¶¶38-43]. He is the very definition of a first-time offender.

-Mr. Maynard is 32 years old and has three minor children for whom he is responsible. He is a caring father. He regularly and consistently provides assistance to his children and his wife. Two of his children suffer from sickle cell anemia and require treatment every three months and one suffers from asthma and complications from a concussion which requires treatment every six months. (See attached Doctor's Letters for daughters Kaliyah and Kasheed and Record Excerpt for daughter She'Nia). Mr. Maynard provides \$200 a month assistance to a one-year-old daughter from another relationship. He has strong and deep support from his family. (See attached letters from five family members).

-Mr. Maynard was actively employed prior to his arrest. Mr. Maynard has always worked both in Tortola, BVI, and in the United States. Mr. Maynard ran Kravins Night Club & Sports Bar in Tortola, he owned Triple K Cleaning Services in Tortola, he managed Triple K Car Rental and Triple K Gourmet Catering in Tortola, he organized an event entertainment business and DJ service in Baltimore, and he worked in Lyft and Uber during the day in Baltimore. (See attached flyers on event entertainment/DJ service and Lyft documentation in Maryland).

- Although Paragraph 69, PSI, states that Mr. Maynard believes he owes back taxes, in fact, his income tax has been paid through 2021. (See Paragraph 70, PSI).

-Mr. Maynard suffers from gout and has latent tuberculosis. He has been prescribed allopurinol, which is used for the treatment of gout. Unfortunately, his gout is probably the result of Mr. Maynard's prior drinking habits for which alcohol/substance abuse treatment should be recommended.

-Mr. Maynard, who only reached the 11th grade, is trying to complete his GED while incarcerated. However, he has been informed that he cannot complete the program as it is not available to inmates at FDC.

-Mr. Maynard has provided assistance to the prosecution in this case. The cooperation is ongoing and the extent of Mr. Maynard's cooperation merits a reduced sentence as will be detailed at sentencing.

-Mr. Maynard is truly remorseful for his actions. *See, e.g., United States v. Howe*, 543 F.3d 128, 138 (3rd Cir. 2008)(remorse is a §3553 factor justifying a downward variance). (See attached letter from Mr. Maynard).

(III)

The seriousness of the offense/ promote respect for the law/ provide just punishment

Mr. Maynard submits that a sentence below the current guidelines range is warranted in this case. Such a sentence would clearly correspond to the seriousness of the offense, promote respect for the law, and provide just punishment for the offense. Such a sentence would afford adequate deterrence to future criminal conduct and protect the public from further crimes. Mr. Maynard is truly remorseful for his actions in this case. He has cooperated with the Government. Mr. Maynard has been debriefed and has provided important information that has been beneficial to the Government. He remains available to continue his cooperation. Mr. Maynard submits that he should be given significant consideration at sentencing for his cooperation

to date under §3553. See, e.g., *United States v. Robinson*, 741 F.3d 588, 599-601 (5th Cir. 2014). Mr. Maynard has vital family obligations to his wife and his minor children. All of these factors support a variance in this case.

Conclusion

It is within this Court's power to impose a sentence under all the factors listed in §3553(a) and grant a variance from the stated guidelines range. Such a sentence would serve the interests identified in §3553(a), would permit Mr. Maynard to become a rehabilitated member of society and would allow him to continue to fulfill his pressing family obligations.

WHEREFORE, Defendant respectfully submits these Objections to the Pre-Sentence Investigation Report and Sentencing Memorandum.

Respectfully submitted,

LAW OFFICES OF
J. RAFAEL RODRÍGUEZ
Attorneys for
KADEEM STEPHAN MAYNARD
6367 Bird Road
Miami, FL 33155
(305) 667-4445
(305) 667-4118 (FAX)
jrafrod@bellsouth.net

By: s/ J. Rafael Rodríguez
J. RAFAEL RODRÍGUEZ
FLA. BAR NO. 302007

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 10th day of August, 2023, a true and correct copy of the foregoing Objections to Pre-Sentence Investigation Report was filed with the Clerk of Court using CM/ECF and served on the same day on Kevin Gerarde, Esq., Assistant United States Attorney.

s/ J. Rafael Rodríguez
J. RAFAEL RODRÍGUEZ

DOCTOR'S LETTERS FOR
KALIYAH MAYNARD AND KASHEED MAYNARD



Fouad Hajjar, MD
Dennis Borrero, MD
Matthew Henderson, DO
Chenue Abongwa, MD

August 7, 2023

To Whom It May Concern:

Kaliyah Maynard (date of birth: 05/16/2012) is a patient of Dr. Fouad Hajjar with the Advent Health Pediatric Hematology and Oncology clinic in Orlando, FL. Kaliyah was diagnosed with sickle cell disease at birth, which is a lifelong diagnosis. She is followed closely for this diagnosis, requiring multiple doctors visits and close monitoring for any complications.

Should you have any questions, please feel free to call us at 407-303-2080.

Thank you,

A handwritten signature in black ink that reads "Fouad Hajjar MD".

Fouad Hajjar, MD

Extending the Healing Ministry of Christ

2501 North Orange Avenue, Suite 589 • Orlando, FL 32804 • (407) 303-2080 | (407) 303-2085 FAX | AdventHealthMedicalGroup.com



Fouad Hajjar, MD
Dennis Borrero, MD
Matthew Henderson, DO
Chenue Abongwa, MD

August 7, 2023

To Whom It May Concern:

Kasheed Maynard (date of birth: 12/14/2018) is a patient of Dr. Fouad Hajjar with the Advent Health Pediatric Hematology and Oncology clinic in Orlando, FL. Kasheed was diagnosed with sickle cell disease at birth, which is a lifelong diagnosis. He is followed closely for this diagnosis, requiring multiple doctors visits and close monitoring for any complications.

Should you have any questions, please feel free to call us at 407-303-2080.

Thank you,

A handwritten signature in black ink, appearing to read "Fouad Hajjar, MD".

Fouad Hajjar, MD

Extending the Healing Ministry of Christ

2521 North Orange Avenue, Suite 587 | Orlando, FL 32804 | (407) 303-2080 | (407) 303-2085 FAX | AdventHealthMedicalGroup.com

SHE'NIA MAYNARD
MEDICAL RECORD EXCERPT

Ambulatory Summary for She'Nia Fahie

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Allergies

| Code | Code System | Name | Reaction | Severity | Status | Onset |
|------|-------------|------|----------|----------|--------|-------|
| NKDA | | | | | | |

Medications

| Name | Status | Start Date | Stop Date |
|---|-----------|------------|---------------|
| albuterol sulfate HFA 90 mcg/actuation aerosol inhaler | Active | | Not available |
| clotrimazole 1 % crea | Completed | | 04/08/2019 |
| clotrimazole 1 % topical cream APPLY 1 APPLICATION(S) TWICE A DAY BY TOPICAL ROUTE AS DIRECTED. | Completed | | 09/24/2019 |
| diareseq pak | Completed | | 09/24/2019 |
| DiaResQ 4 gram-35 kcal/7 gram oral powder packet Take 1 packet every day by oral route as needed. | Completed | | 09/24/2019 |
| ferrous sulfate 325 mg (65 mg iron) tablet TAKE 1 TABLET BY MOUTH EVERY DAY WITH MEALS | Completed | | 05/08/2021 |
| ondansetron 4 mg disintegrating tablet | Completed | | 11/16/2021 |
| prednisolone 15 mg/5 mL oral solution TAKE 12 ML BY MOUTH DAILY | Active | | Not available |
| Replesta 1,250 mcg (50,000 unit) oral wafer TAKE 1 WAFER(S) EVERY WEEK BY ORAL ROUTE AS DIRECTED. | Completed | | 09/24/2019 |
| Replesta NX 350 mcg (14,000 unit) oral wafer TAKE 1 WAFER(S) EVERY WEEK BY ORAL ROUTE AS DIRECTED. | Completed | | 09/24/2019 |
| ventolin hfa 108 mcg/act aers | Completed | | 09/24/2019 |

Problems

| Name | Status | Onset Date | Source |
|-----------------------|---------|------------|--------|
| Asthma | Unknown | 10/12/2017 | |
| Pityriasis Versicolor | Unknown | 11/10/2018 | |
| Blood in Urine | Unknown | 11/10/2018 | |
| Anemia | Unknown | 09/25/2019 | |

Procedures

None recorded.

Compendium
DO Not
Attach
Compendium,
Do Not
Delete/merge

Past Encounters

| Encounter Date | Diagnosis | Provider |
|----------------|--|---|
| 11/16/2021 | Postconcussion Syndrome | Suzette Scipio Ettienne, MD: 2905 Mitchellville Rd, Ste 115, Bowie, MD 20716-1391, Ph. (301) 390-7960 |
| 11/02/2021 | Concussion with No Loss of Consciousness; Microcytic Hypochromic Anemia | Suzette Scipio Ettienne, MD: 2905 Mitchellville Rd, Ste 115, Bowie, MD 20716-1391, Ph. (301) 390-7960 |
| 06/15/2021 | On Examination - Overweight | Suzette Scipio Ettienne, MD: 2905 Mitchellville Rd, Ste 115, Bowie, MD 20716-1391, Ph. (301) 390-7960 |
| 05/08/2021 | Well Child Visit; On Examination - Overweight; Depression Screening; Cough Variant Asthma | Suzette Scipio Ettienne, MD: 2905 Mitchellville Rd, Ste 115, Bowie, MD 20716-1391, Ph. (301) 390-7960 |
| 09/24/2019 | Well Child; Depression Screening; Active or Passive Immunization; Anemia Screening; Hyperlipidemia Screening; Vitamin D Deficiency | Suzette Scipio Ettienne, MD: 2905 Mitchellville Rd, Ste 115, Bowie, MD 20716-1391, Ph. (301) 390-7960 |
| 05/11/2019 | Active or Passive Immunization | Suzette Scipio Ettienne, MD: 2905 Mitchellville Rd, Ste 115, Bowie, MD 20716-1391, Ph. (301) 390-7960 |
| 04/08/2019 | Acute Diarrhea | Suzette Scipio Ettienne, MD: 2905 Mitchellville Rd, Ste 115, Bowie, MD 20716-1391, Ph. (301) 390-7960 |
| 11/10/2018 | Well Child; Active or Passive Immunization; Hyperlipidemia Screening; Vitamin D Deficiency; Pityriasis Versicolor; Blood in Urine | Suzette Scipio Ettienne, MD: 2905 Mitchellville Rd, Ste 115, Bowie, MD 20716-1391, Ph. (301) 390-7960 |
| 10/12/2017 | Well Child; Asthma; Active or Passive Immunization | Suzette Scipio Ettienne, MD: 2905 Mitchellville Rd, Ste 115, Bowie, MD 20716-1391, Ph. (301) 390-7960 |

Social History

Tobacco Smoking Status

Never Smoker

ATTACHMENT
FAMILY LETTERS

SHERISMA FAHIE-MAYNARD (WIFE)

KALIYAH S.O. MAYNARD (DAUGHTER)

SHE'NIA FAHIE (DAUGHTER)

DAPHNE ADAMES (MOTHER OF MR. MAYNARD'S ONE-YEAR-OLD CHILD)

DESHOY JAMES (WIFE'S COUSIN)

Sherisma K. Fahie- Maynard
Orlando, FL 32792

June 22, 2023

Judge Kathleen Williams
Southern District of Florida
Wilkie D Ferguson Jr, United States Courthouse
400 North Miami Avenue
Miami, FL 33128

Dear Judge Williams,

My name is Sherisma Fahie- Maynard, I am the wife of Kadeem Stephan Maynard. My husband and I have been married for 5 years and together for 16 years. We have a beautiful family, two daughters (16 & 11) and a son (4). She'nia is the oldest of the children and I had her prior to being in a relationship with my husband. My husband has raised her since was 1 year of age and acknowledges her as his first child and his daughter. He has never used the term stepdaughter to describe their connection or relation. Kaliyah is the second oldest child who was conceived prior to our marriage and our youngest, Kasheed was conceived during our marriage.

My husband is one of the most loving, kind, cheerful, dependable, humorous, hardworking and family-oriented man that you would ever meet. His love and desires for his family are beyond what words can describe. I admire the love and bonds that he shares with each of our children. Over the years I have been able to share and experience so much with my husband. He has been faced with trials, failures, success, sadness, happiness, hard times and betrayal from friends just like any other human being. Of all the things he has encountered throughout life, he has never let the challenges or struggle prevent him from pushing on. He would continue to get up and push on because he knows that his family looks up to him and depends on him, especially his children! My King, as I call him, is a jack of all trades, he wears so many hats to provide for our family. Business owner, DJ, Lyft/Uber driver, clerical worker, he did all of the mentioned to provide for us financially.

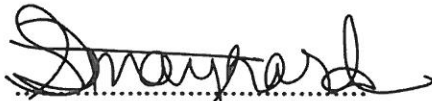
Your honor, since the day of my husband's arrest, life has not been the same. I get up each day wishing and hoping that it is all just a bad dream, but reality hits me every day and I have to face the fact that it's not. My husband is my backbone, my motivator, my counselor, my best friend, my support system, and the love of my life. He has made a very huge mistake and it has not only affected him, but it has also affected his friends, business, and most of all the children and I. It has been very hard on me, financially, physically, and mentally. It is very difficult, especially now that I am left alone to deal with three children that are faced with health issues. Kasheed & Kaliyah both have Sickle Cell and She'nia has asthma along with severe migraines that she experiences from time to time as a result of a concussion that she has experienced in 2021. Kasheed & Kaliyah are required to see the doctors on a demanding schedule, and it is very difficult to get time off from work to

attend their doctor visits. The hurtful part is, I am often forced to choose between my children's health and an income which it is also important to be able to provide for them. As you may know, with sickle cell, it is unpredictable to determine when they may encounter crisis, and if and when they do, hospitalization is required in most instances.

Judge Williams, Kadeem is extremely disappointed and sorry for his actions, he takes full responsibility. He has expressed in so many ways that this is the biggest mistake of his life, and he will never get involved in any criminal activity as long as he shall live, regardless of the circumstance of life. Throughout the past year, it has been extremely difficult for my husband to face the fact that he has let his children down. He is devastated due to the inability to witness their growth, accomplishments and just being physically present in their day-to-day lives. He worries that they may grow up resenting him for not being present for them. He apologizes ever so often for putting me through so much pain, embarrassment, and difficulty.

I know that my husband has broken the law, and consequences are required for such actions. Your Honor, the power lies in your hands, so I am asking for your leniency and understanding when you make your final decision. I hope that you were able to see the true picture of who my husband really is versus the case version of who he appears to be. He is a great man and deserves the opportunity to prove that he is an asset to the community and the people in his life. I can attest that if he's granted a second chance, you will not be disappointed in your decision. The children and I miss him dearly and are praying and hoping that he will be home very soon. Thank you for your time, it's greatly appreciated.

Sincerely,



Sherisma Fabie-Maynard

Kaliyah S.O. Maynard
Orlando, FL 32792

June 18, 2023

Judge Kathleen Williams
Southern District of Florida
Wilkie D Ferguson Jr, United States Courthouse
400 North Miami Avenue
Miami, FL 33128

Dear Judge Williams,

My name is Kaliyah S.O. Maynard. I was born on May 15, 2012. I am the daughter of Kadeem Maynard. My dad along with my mom Sherisma Maynard has taken care of me since I was born. I love my parents very much. I've always had a good relationship with my dad and sometimes I don't always agree with what he says. As I got older, I understood that he only wants the best for my siblings and I. My dad always does his best to make us happy. He works a lot to pay the bills and buy us things that we like and want. I want my dad to come back home because home is not the same without him. I am very sad without him and I'm positive he will add back more love into our family. My Dad is not a bad person, he is a wonderful husband, brother, son, uncle, friend and most important a wonderful Dad. Everyone loves and misses him, my wish is that you give him a chance. My dad told me that he will never make a mistake like this ever again, because his mistake took him away from our family and he would never want to hurt or disappoint us again. Please I beg you to let my dad come back home so that our family can be happy again.

Sincerely,

Kaliyah Maynard
Kaliyah S.O. Maynard

She'nia K.E. Fahie
Orlando, FL 32792

June 25, 2023

Judge Kathleen Williams
Southern District of Florida
Wilkie D Ferguson Jr, United States Courthouse
400 North Miami Avenue
Miami, FL 33128

Dear Judge Williams,

I am 16 year old She'nia Fahie, I am the oldest of my siblings that I live with. Kadeem Maynard, known as dad to me, has been in my life since I was a little girl, and he has always treated me like his very own. To be exact he brags to the world that I am his oldest daughter. My dad is a wonderful person and a great husband to my mom. He goes above and beyond to provide for us, and he tries to always keep a smile on our faces. He is a hardworking person, and in my eyes sometimes he works a little too much! I have a good relationship with my dad, our #1 bond is music, he thinks that he knows more music than I do, because he's a DJ. But he's always in for a surprise because I just happen to always know songs that he hasn't heard or knows about!

On April 28, 2022, my family and I lives were changed. It was the most devastating thing I have ever experienced. Since that day nothing has been the same, birthdays are not the same, Christmas was not the same, even the state we live in has changed. I was so confused and wanted so many answers because I did not understand how a great person like my dad could end up in prison. I eventually learned that not everyone in prison is a bad person, it's just that good people sometimes make wrong choices and mistakes. With every mistake big or small there are consequences. While this is true, I've also learned that some people are given second chances. Judge Williams, I am not sure what is required for a person to get a second chance, but I am asking you to give my dad a second chance. He is a great person that made a terrible mistake, he is sorry for his actions, and I hope that you find it in your heart to give him a second chance. My family and I need my dad. It will mean the world to us if you give him the opportunity to return home to us.

Thank you,


She'nia Fahie

June 26, 2023

Judge Katherine Williams
Southern District of Florida
Wilkie D Ferguson Jr, United States Courthouse
400 North Miami Avenue
Miami, FL 33128

RE: Character Letter for Kadeem S. Maynard

Never in a million years would I have imagined myself writing a letter defending Kadeem's character. Nevertheless, it is my pleasure to do so.

I have known Kadeem for approximately twelve years, and I could honestly say he is one the most genuine, caring, funniest, and thoughtful person I have encountered in my lifetime. Not saying he is perfect and that he does not have faults like all human beings; however, his good out ways the bad. I can truly say Kadeem is the type of person to give his last to any one in need of assistance, even if that involves leaving himself undone without looking forward to anything in return. He is sensitive, attentive, and suffers when he feels what he gives to others is not reciprocated.

Kadeem became my best friend, my confidant, and my support system. He has taught me that forgiveness, letting go and let God makes life a little easier. Kadeem would be the person I call when I find myself frustrated, when I receive excited or bad news or needed when at my weakest. Consequently, not having him around for the past year has been like reliving a nightmare repeatedly with no ending.

Over the past year, Kadeem has shown how remorseful he is of the decisions he made and has expressed that if given the opportunity, he would not have made the same mistakes. One of his greatest hurt and regret comes from not being able to experience his daughter's growth. Kadeem has communicated how not being able to witness her first steps, caring for her when sick and nurturing her has taken a toll on him mentally.

He now understands that his decisions did not only change his life, but has affected and change the quality of life of everyone dependent on him emotionally and financially. In addition, Kadeem desires an opportunity to amend all the pain and suffering caused.

Wish I had shown him, how much I actually need, care, and love him. I find myself saying it took to lose him to realize that what he represents is not easily found neither replaceable. Subsequently I would like him to know that I appreciate all the sacrifices he has made whether insignificant or vast, and cherish every memory we have created thus for.

I understand the seriousness of this case; and what he has done is a crime, which is punishable with time served. However, I hope that this letter serves as consideration when referring to his sentence.

Sincerely,



Daphne Adames

Deshoy James
Laurel, Maryland

June 14, 2023

Judge Kathleen Williams
Southern District of Florida
Wilkie D Ferguson Jr, United States Courthouse
400 North Miami Avenue
Miami, FL 33128

Dear Judge Williams,

My name is Deshoy James. I'm an in law turned brother of Mr. Kadeem Maynard. I've known Kadeem for the past 6 years and I must say that Kadeem marrying my cousin Sherisma is one of the best things that has happened to our family. Kadeem has brought significant transformation and value to our family through being a wonderful man of good character, a loving husband and father to his wife and children and by being a person that always does his best to set a positive example in the community. He strives to bring change and make things better for everyone. Our family needed someone like Kadeem to inspire us to keep pushing forward no matter the cards you've been dealt and live a purposeful life.

In the past 3 years I've had the chance to become close to Kadeem and I've observed that he truly has a loving, caring soul and heart of gold. His mentality is that everyone can win and be their best self if we work together and help each other grow. It's sad and hurtful that Kadeem has been away from us, his presence truly makes a difference in our lives. I'm glad that he has been building a stronger relationship with God and taking his spiritual walk to another level, that's a testament of how important growth and development is to Kadeem. Judge, I pray you find it in your heart to give Kadeem another chance to continue to be the great man we know him to be. I know 100 percent that it's only good and positive things that will come from Kadeem. Kadeem is an asset to society, not a liability. I truly believe that Kadeem deserves the opportunity to prove that this world and society is a better place with him in it.

Thank you for reading my letter, I greatly appreciate your time!

Sincerely,

D. James

.....
Deshoy James

KADEEM MAYNARD
ENTERTAINMENT/DJ SERVICE FLYERS

Carriboeem Nights



JULY
FRIDAY
30
9PM - UNTIL

HIPHOP • REGGAE • DANCEHALL

**CARIBBEAN FOOD
WILL BE ON SALE**

MUSIC & ENTERTAINMENT

DJ. BLACKKA + DJ. POPEYE
BRITISH VIRGIN ISLANDS
(OUTTA JAMAICA)



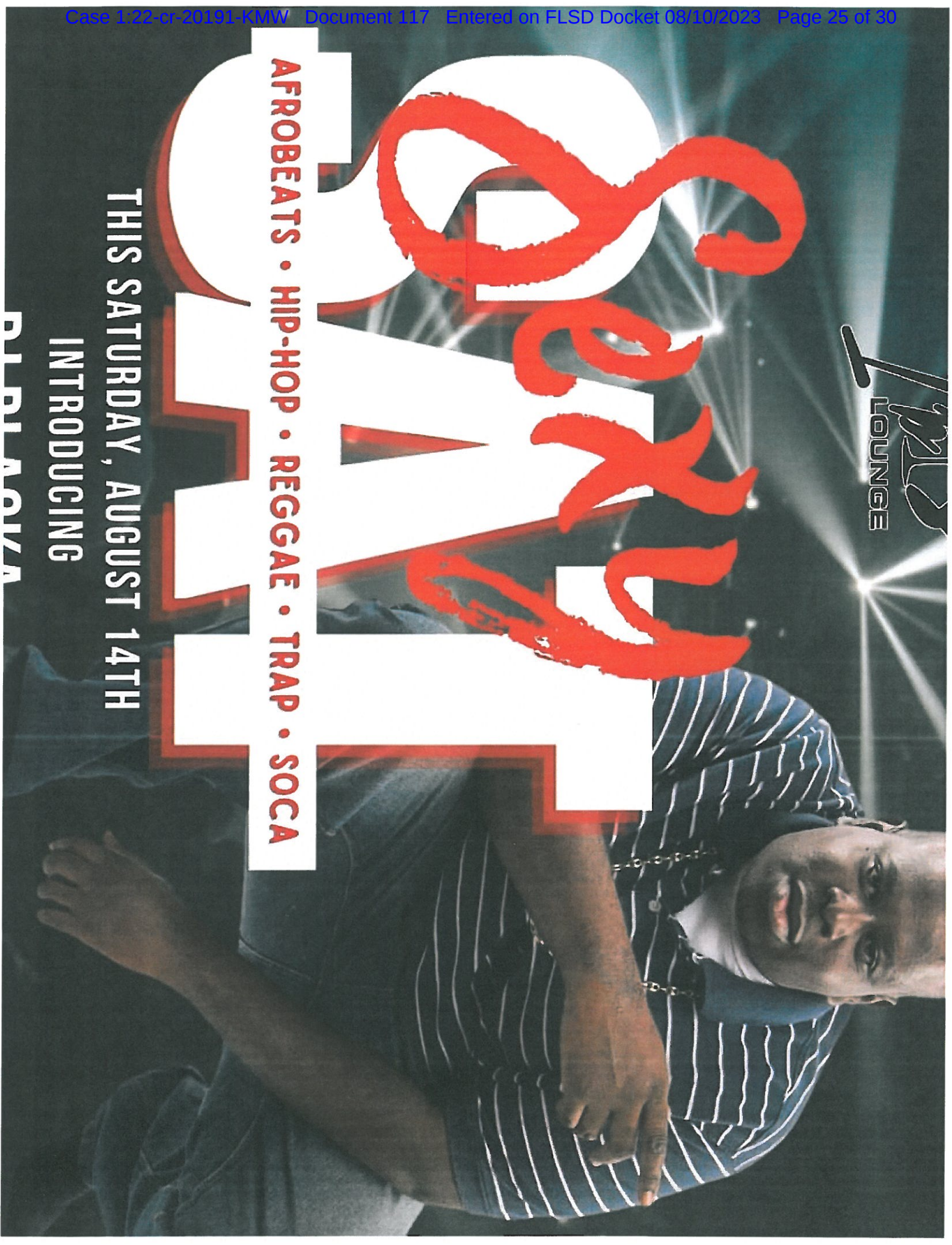
T
LOUNGE

SOX

AFROBEATS • HIP-HOP • REGGAE • TRAP • SOCA

THIS SATURDAY, AUGUST 14TH
INTRODUCING

PIZZA



KARAOKE NIGHT

EVERY WEDNESDAY

FROM 9PM-UNTIL
ADMISSION FREE ALL NIGHT

ENTERTAINMENT BY

DJ. BLACKKA





Kadeem Maynard

★ 5.00

502 Rides

Active

Personal Info

Email

kravinspromotions@gmail.com

Phone

1-301-455-4033

Shipping Address

547 Tranquil Ct., Apt.C,
ODENTON, MD 21113

[Edit](#)

Documents



Driver's License
Expires May 3, 2027



ATTACHMENT
KADEEM STEPHAN MAYNARD LETTER

July 1, 2023,

Judge Kathleen Williams
Southern District of Florida
Wilkie D Ferguson Jr, United States Courthouse
400 North Miami Avenue
Miami, FL 33128

Dear Honorable Judge Kathleen Williams,

I want to take this time sincerely apologize to you your Honor, to the officers of the courts and the United States of America and mostly to my family for my actions that have caused me to be before you over the past year. I have let myself down and most definitely my kids, as this is not the example, I intend to set for them. It hurts sitting incarcerated knowing that they are not proud of their dad. I have also brought embarrassment to my wife, which I have been with for the past 16 years and my mom who has played a huge part in my life. However, this does not define who I am, this was a first attempt and definitely my last! I did this out of desperation and temptation, and it was a huge mistake. Actually, the biggest mistake I have made in my life. I just wanted to be able to save my family home from repossession and to be able to provide for my kids and their future, as well as being a help to others in need. I saw how hard my mom worked to get that home and I just wanted to do all I can to save it.

Your Honor, I will not sit and make excuses for my actions. I would like to make it clear that I take full responsibility for my actions, and I want to say, "I'm sorry". What I will do is plead to you your honor for a second chance, to make things right in my life and with my children. I would like to ask for any sort of leniency that can be given to me, so that I will not miss any more of my children growth. I want to be present so that I can steer them into the right direction, so they would never have to walk the path that I have walked. I have four children, ages sixteen (16), eleven (11), four (4) and one (1). I am asking as a desperate and broken father to allow me the chance to be in their lives and be there for them in every way as they grow. I am asking for any term other than imprisonment, whether it be probation or house confinement, so I can be able to assist with taking care of them as the mom struggle with their health issues and daily life. Two (2) of my children

suffers from sickle cell and this is challenging on my wife, because she is in and out of hospital and doctor visit with them. My oldest daughter suffers from migraines and is also asthmatic, this is very difficult without help or assistance, as my wife is left alone with all this responsibility, while also working full time.

I am not the same person that I was when I walk into prison. The time away from my loved ones made me value so many things more. With the time I have been incarcerated I was able to elevate my mind and see what's more important. Your Honor, as I write to you, I stand guilty before you, but I promise you "I will never be involved again in any criminal activity". I have an amazing family that loves me and awaits my return home. I have lost everything, due to this, even my business I have worked so hard for since I was 16 years, but one thing I do have left is a big heart, a willing and ambitious mind. I will show my family, you your Honor and the United States of America and myself that I can be a better me.

My plan after incarceration is to continue working on my GED that I have started studying for. I also intend to get my CDL license and open a trucking company right here in Florida. I have spent time while incarcerated, working on my business plan and ideas to get this business going. I have the full support of my wife for this business venture, and she has sourced business startup grants that I will apply to for startup funding. I will also continue to play a big role in the community by helping others and I will continue to be active and present in my children life and future careers. All I am asking for is a second chance, I have so much potential, and prison is not the answer for me. I know that you have a busy schedule, so I will end by expressing once more how extremely sorry I am for my actions. I can guarantee you, that I won't be in any court rooms again if given a second chance.

Thank you for your time and I would be truly grateful for any consideration, you can give to me on this matter.

Sincerely,

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Kadeem Stephan Maynard