

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

Criminal Action No. 21-cr-00034-WJM

UNITED STATES OF AMERICA,

Plaintiff,

v.

2. BRYANT EDWIN SEWALL,

Defendant.

DEFENDANT SEWALL'S MOTION FOR BELOW GUIDELINE SENTENCE

Defendant Bryant Sewall, by and through undersigned counsel, respectfully moves this Court to impose a sentence below that recommended by the advisory United States Sentencing Guidelines, stating the following grounds:

I. Introduction

Bryant Sewall comes before the Court for sentencing upon the jury's verdict finding him guilty of 14 counts of Wire Fraud in violation of 18 U.S.C. § 1343 and 1 count of Conspiracy in violation of 18 U.S.C. § 371 (Doc. 1, Doc. 309). For the reasons set forth herein, Mr. Sewall respectfully requests that the Court sentence him to a term of imprisonment of no more than 24 months.

II. Sentencing under 18 U.S.C. § 3553(a)

The Court's sentencing decision is guided and governed by 18 U.S.C. § 3553, which directs that the Court should impose a sentence that is sufficient, but not greater than necessary, to comply with the purposes set forth in paragraph 2 of that subsection. In making its

determination, the court is specifically directed to consider both the nature and circumstances of the offense and the history and characteristics of the defendant, among other factors.

The guidelines promulgated by the Sentencing Commission are advisory. Rather than focusing solely on the calculated guideline range, courts must “consider all of the § 3553(a) factors to determine whether they support the sentence requested by a party.” *Gall v. United States*, 128 S.Ct. 586, 596 (2007). The sentencing court should consider arguments that the guidelines should not apply on general policy grounds, case specific grounds, or any other factor that might render a particular sentence “reasonable”. *Gall*, 128 S.Ct. at 596-97. In short, the court must “consider every convicted person as an individual and every case as a unique study in human failings that sometimes mitigate, sometimes magnify, the crime and punishment to ensue.” *Gall*, 128 S.Ct. at 598.

A. Guideline computation

The sentencing guidelines fulfill an important role in avoiding “unwarranted sentence disparities among defendants with similar records who have been found guilty of similar conduct.” 18 U.S.C. § 3553(a)(6). As such, the sentencing court “should begin all sentencing proceedings by correctly calculating the applicable guidelines range.” *Gall*, 128 S.Ct. 586 at 596.

1. Probation’s calculation and recommendation

The probation department calculates Mr. Sewall’s guideline range as follows (PSIR, Doc. 381, pp.16-19):

- The base offense level is 7
- 24 levels are added because the loss was between \$65,000,000 and \$150,000,000. (31)
- 6 levels are added because more than 25 victims suffered substantial financial harm. (37)
- 2 levels are added because the offense was committed from outside the United States and/or involved sophisticated means. (39)
- 4 levels are added due to the defendant’s aggravated role in the offense. (43)

- 2 levels are added because the defendants abused a position of private trust. (45).

Based on the calculations above, Probation contends that the Adjusted Offense Level is 45. Pursuant to USSG Ch. 5, Pt. A, comment. (n.2), an offense level of more than 43 is to be treated as an offense level of 43. Therefore, the Total Offense Level is 43.

Mr. Sewall has zero criminal history points and is in Criminal History Category I. The Total Offense Level of 43 in Criminal History Category I produces a guideline imprisonment range of life. However, because the statutorily authorized maximum term of 285 years¹ is less than the guideline range, the guideline term of imprisonment becomes 285 years, or 3,420 months. The probation officer has recommended a total sentence of 25 years, noting that the 58-year-old Mr. Sewall would “effectively spend the remainder of his productive years in prison.” (Doc. 381-1, pp. R-1, R-11).

2. Defendant’s calculation

Mr. Sewall calculates the guideline range as follows (see, Defendant Bryant Sewall’s Objections to Presentence Investigation Report (Doc. 408):

- The base offense level is 7
- 18 levels are added because the loss was between \$3,500,000 and \$9,00,000. (25)
- 4 levels are added because more than 5 victims suffered substantial financial harm. (29)
- 2 levels are added because the offense was committed from outside the United States and/or involved sophisticated means. (31)
- 2 levels are subtracted by operation of the zero-point offender adjustment in USSG §4C1.1 (29)

¹ The statutory maximum term of imprisonment for Counts 1-14 is 20 years. The statutory maximum term of imprisonment for Count 5 is 5 years. The sum of the statutory maximums on all counts is 285 years.

Based on the calculations above, the **Total Offense Level is 29**. The Total Offense Level of 29 in Criminal History Category I produces a guideline imprisonment range of **87-108 months**.

B. The loss calculation under the sentencing guidelines does not provide an accurate measure of culpability

The Court should impose a sentence substantially below that recommended by the sentencing guidelines because §2B1.1's overreliance on the amount of financial loss results in an advisory guideline range that is unreasonable.

Both courts and commentators have recognized that §2B1.1 places “inordinate emphasis ... on the amount of actual or intended financial loss.” *United States v. Adelson*, 441 F. Supp. 2d 506, 509 (S.D.N.Y. 2006); *United States v. Emmenegger*, 329 F. Supp. 2d 416, 427 (S.D.N.Y. 2004) (“The Guidelines place undue weight on the amount of loss involved in the fraud.”); Barry Boss and Kara Kapp, *How the Economic Loss Guideline Lost its Way, and How to Save It*, 18 Ohio St. J. Crim. L. 605, 605–06 (2021) (“§2B1.1 ... routinely recommends arbitrary, disproportionate, and often draconian sentences to first-time offenders of economic crimes.”) In its current form, the guideline breaks loss amounts into 16 brackets, each representing a 2-level increase in the offense level. The magnitude of the loss enhancement can single-handedly drive the severity of sentences handed down to economic crime offenders. Though the guideline's base offense level is 7, a defendant in the uppermost tier is given an enhancement of *30 levels*, resulting in an offense level of 37 based on loss alone. The result is a frequent ascent into offense levels that most laypeople would assume are reserved for the most violent of murderers, rapists and drug kingpins.

While long sentences may be warranted in certain cases, §2B1.1's over-reliance on loss too frequently fails to properly weigh the harm that a defendant has caused. Indeed, courts have

identified numerous circumstances in which § 2B1.1 produces sentencing ranges that are too high. See, e.g., *United States v. Forchette*, 220 F. Supp. 2d 914, 924 (E.D. Wis. 2002) (collecting cases). These include:

- when external factors such as economic downturn, market collapse, or victim negligence also contributed materially to the amount of loss, *Forchette*, 220 F. Supp. at 924 (E.D. Wis. 2002) *United States v. Rostoff*, 53 F.3d 398 (1st Cir. 1995); *United States v. Morris*, 80 F.3d 1151 (7th Cir. 1996);
- where a defendant’s role in a scheme bears little relationship to the amount of loss, *Forchette* at 925 (citing *United States v. Brennick*, 134 F.3d 10, 13 (1st Cir. 1998); *United States v. Broderon*, 67 F.3d 452, 459 (2d Cir. 1995); *United States v. Monaco*, 23 F.3d 793, 799 (3d Cir. 1994);
- when the defendant has made substantial efforts to remedy his conduct, *United States v. Oligmueller*, 198 F.3d 669, 671-72 (8th Cir. 1999); *United States v. Bean*, 18 F.3d 1367, 1369 (7th Cir. 1994);

The guideline fails to adequately take these and other factors into account, while not “explaining why it is appropriate to accord such huge weight” to loss. *Adelson*, 441 F. Supp. 2d at 509. Further, the loss guideline “was not developed by the Sentencing Commission using an empirical approach based on data about past sentencing practices.” *United States v. Corsey*, 723 F.3d 366, 379 (2d Cir. 2013) (Underhill, J., concurring). Therefore, the sentencing court “can and should exercise its discretion when deciding whether or not to follow the sentencing advice that guideline provides.” *Id.*, citing *Kimbrough v. United States*, 552 U.S. 85, 109-10, 128 S. Ct. 558, 169 L. Ed. 2d 481 (2007). Indeed, many courts have done exactly that and found the guideline’s overreliance on loss to be a fundamental flaw. See, e.g., *United States v. Johnson*, 2018 U.S.

Dist. LEXIS 71257 (E.D.N.Y. Apr. 26, 2018) (“loss-enhancement numbers do not result from any reasoned determination of how the punishment can best fit the crime, nor any approximation of the moral seriousness of the crime.”); *United States v. Moody*, 2013 U.S. Dist. LEXIS 109506 (D. Colo) (Kane, J.) (“The history of bracket inflation ... renders the loss guideline fundamentally flawed.”) As a result, Sentencing Commission data shows that “courts depart or vary below the guidelines in the majority of cases to which the §2B1.1 loss enhancement applies.” Boss and Kapp, *supra*, pp. 620-621.

C. The Court should dampen the cumulative effect of the guideline’s multiple overlapping enhancements

The ratcheting effect of the loss table is exacerbated by the guideline’s reliance on overlapping special offense characteristics that result in a substantial overstatement of the seriousness of the offense. Mr. Sewall receives an additional 6 levels under §2B1.1(b)(2)(C), though it is difficult to imagine an offense involving tens of millions in loss where there would *not* be numerous victims who experience substantial financial hardship. Similarly, virtually any financial crime causing such losses will require that “sophisticated means” are employed, will involve the defendant’s use of some mechanism to gain a position of trust with the victim, and will be “otherwise extensive.” These factors expose the defendant to multiple additional levels launching the recommended sentence into the stratosphere even though their presence does not necessarily make the defendant any more morally culpable than he would be without them.

The lunacy of the process is demonstrated by the advisory guideline range yielded by application of the guideline in this very case. Mr. Sewall’s offense level of 45 as calculated by Probation is literally “off the chart,” which terminates at Level 43. It is so high that the fact that Mr. Sewall has led a law-abiding life with zero criminal history points is rendered entirely irrelevant, as the guideline at this offense level recommends a sentence of life imprisonment at

every Criminal History Category. This is particularly harsh when considering that Mr. Sewall's role in the offense was not the driver of the amount of loss. Mr. Sewall had no involvement in raising money from potential investors and had no control over how much money was eventually raised. His job was simply to trade in the Forex market, and his conduct would have been the same whether Stewart and Young convinced the victims to invest 5 million, 50 million, or 500 million. Even recognizing that Mr. Sewall's offense is a serious one with substantial victim impact, few would agree that a sentence of "life" (or even the "lesser" 285 years) is anything approaching "reasonable" under the facts of this case.

III. Relevant § 3553(a) factors justifying a sentence below the advisory guideline range

The touchstone of sentencing is that the Court should impose a sentence that is "sufficient, but not greater than necessary" to accomplish the sentencing objectives set forth in 18 U.S.C. §3553(a)(2). Review of those factors compels the conclusion that a sentence within the advisory guideline range in this case would be far greater than necessary to achieve the statutory objectives of sentencing. Regardless of what the Court determines to be to correct calculation of the advisory sentencing guideline range, the Court should impose a sentence well below.

A. History and characteristics of Bryant Sewall

Bryant Sewall is 58 years old. He has no criminal history. More importantly, he has lived a life of honor and integrity, marked by his distinguished service in the United States Marine Corps, that should weigh heavily in favor of a sentence significantly less than the advisory guideline range or the sentences recommended by Probation and the government.

Most importantly, Bryant is regarded in the highest esteem by the people who know him best and have seen the good works he has done. The unfortunate circumstance of the matter

before the Court brought forth an outpouring of support that is consistent and overwhelming in expressions of disbelief that the person they know could be facing sentencing for a criminal act.

- “Bryant has always held himself to high standards of physical fitness, healthy living, community involvement, and dedication to his family.” **Exhibit A**, p. 5.
- “Bryant was widely respected by all for his impeccable integrity and selfless devotion to duty at the highest levels.” **Exhibit A**, p. 6.
- “Bryant is known by his closest friends as one who will give the shirt off his own back to help someone else.” **Exhibit A**, p. 7.
- “I witnessed his commitment to serving others and living a life guided by strong moral principles. His dedication to helping those in need, along with his unwavering work ethic, has consistently set him apart as a role model in our community.” **Exhibit A**, p. 18.
- “He has made such a difference in the lives of many young people who needed guidance. He has helped those on the road who could not help themselves. He has done SO much good.” **Exhibit A**, p. 10.

1. Early life

Bryant Sewall was born in Dallas, Texas in 1966. His father was a Navy pilot who served for 26 years including combat in Vietnam where he flew dangerous missions into enemy territory and suffered exposure to deadly toxins (that later led to his death from pulmonary fibrosis). His mother was a homemaker who instilled in Bryant and his sister the values of commitment, integrity, and respect for others. From a very young age, Bryant knew that he wanted to follow his father’s footsteps and serve his country.

Bryant excelled in high school at Trinity Christian Academy, participated in countless sports and activities, and made friendships built on mutual respect that still exist today. Years later he was awarded the Distinguished Alumni Award from Trinity Christian in recognition of his service with distinction to his country. While in high school, Bryant displayed his commitment to serving others and his ability to positively affect the life of a peer with a simple gesture of kindness like welcoming a new student. See, Letter from Kenton Getz, **Exhibit A**, p.

18-19. Before his senior year, Bryant nearly had to withdraw from Trinity Christian because his father's employer had gone into bankruptcy and his family could not afford the tuition. However, Bryant's classmates and their families thought so highly of him, they banded together to pay his tuition so that he would not be forced to withdraw from the school.

After graduation, Bryant attended Austin College where he graduated with a degree in political science. Relying on the strong work ethic that had been instilled in him, Bryant paid his way through school with loans and a 40-hour per week job at UPS. In addition to work and his classes, he played football and ran track, and also joined the Marines and each summer attended the USMC Officer Candidate School. Despite this full slate, Bryant still was able to graduate in four years with a degree in political science and business.

2. Military service

By far the most defining element of Bryant's history and characteristics is his service in the United States Marine Corps². Upon graduation from college, Bryant chose to follow his calling and accepted his commission as a First Lieutenant. After completing officer training and field artillery school, he was assigned to 3d Battalion 11th Marines Artillery and soon thereafter deployed to Iraq during Operation Desert Storm.

Bryant distinguished himself with his service during Desert Storm in 1990-91. He was the lead forward observer and lead element, and was in the third vehicle to cross the border from Saudi Arabia into Kuwait. He faced unimaginable dangers: at one point he was forced to traverse the Al-Wafra Oil Field which had been set afire by Iraqi forces. His uniform was covered in burnt, foul crude oil, as was his face and all exposed skin. In Kuwait, Bryant deployed the first GPS device ever used by U.S. forces, which he used to successfully navigate a battalion of

² Please see Exhibit E, Photos related to military service

Marines through Kuwait to safety. To conclude this mission, Bryant's battalion successfully reached Kuwait International Airport by passing through the Kuwait City landfill, exposing him to toxins and chemicals like his father decades before. Bryant's unit successfully secured the airport, coming up behind a force of 1,000 Iraqi soldiers who surrendered to Bryant's unit *en masse* with no injuries or casualties to his battalion.

Bryant continued to serve with distinction after Desert Storm. In 2003 he was deployed to active combat duty in the Iraq War, where as a Major he led the USMC 4th Anglico to provide close air support to British allies in the 7th Armoured Brigade. There he was instrumental in conducting multiple national security level missions, including commanding an air strike that resulted in the destruction of the Baath Party headquarters in Basra and leading the mission that resulted in the capture of Ali Hassan Al-Majid (better known as "Chemical Ali"), who was the architect of the 1988 genocidal campaign that resulted in the deaths of 100,000 Iraqi Kurds. Bryant served alongside and earned the respect of the British troops and was made an honorary member of the UK 7th Armoured Brigade. Bryant's greatest source of pride from his active combat duty is that he never lost a soldier under his command and brought every last one of them home to their families.

After these combat tours, Bryant continued to excel and advance, eventually reaching the rank of Lieutenant Colonel. In his recommendation letter for the promotion, his Commanding Officer stated:

"Major Sewall is a highly talented, resourceful, and proficient field grade officer. He possesses what, in my opinion, is the essence of a superior Marine Officer and what the Corps desires in a reserve Lieutenant Colonel. It is not his vast experience, his truly superb past performance, nor his confidence-inspiring leadership that make him worthy of promotion, rather it is the infinite potential he exhibits at every challenge he faces that makes Bryant a must for promotion and future command."

Exhibit B, Military Letters and Commendations, p.2.

In 2013, Bryant graduated from the USAF Air War College with a grade of “Outstanding,” a distinction earned by only approximately 1% of graduates in his program. Upon his retirement from the Marine Corps after 30 years of service, Bryant had earned a truly impressive array of awards and recognitions. These include (among others):

Combat Action Ribbon (OEF/OIF Iraq), Combat Action Ribbon (Desert Storm) Southwest Asia Service Medal (w. 2 stars), National Defense Service Medal, Sea Service Deployment Medal, Navy and Marine Corps Achievement Medal, Presidential Unit Citation-Navy, Navy Meritorious Unit Commendation, Selected Marine Corps Reserve Medal, National Defense Service Medal, Global War on Terrorism Expeditionary Medal, Korean Defense Service Medal, Armed Forces Reserve Medal (w. Silver Hourglass), Kuwait Liberation Medal (Saudi Arabia), Kuwait Liberation Medal (Kuwait), Navy Marine Parachutist Insignia; Military Outstanding Volunteer Service Medal.
Exhibit C, DD-214 Forms.

3. Family

By far the most important thing in Mr. Sewall’s life today is his wife, Hanna, and their 4-year-old daughter, Bella³. Throughout his time in the military, Bryant purposely put off thoughts of marrying and starting a family. He knew that the demands of service would take him from home too often to allow him to be the kind of husband and father he aspired to be. While at his last service post in Germany in 2014-15, Bryant met Hanna Ohonkova, a Ukrainian citizen. He knew that the end of his military career was near and that it was time to begin the next chapter. They dated for several years and worked to overcome the challenge of Hanna’s inability to secure a visa to the United States. In 2017, Bryant and Hanna married.

Hanna had fled Ukraine at the outbreak of war in 2014 and was left with constant worry for the safety of the family members she had left behind there. Hanna is grateful for the way

³ Please see **Exhibit D**, Photos of Bryant Sewall and family.

Bryant has supported her in caring for her relatives from afar and the efforts he has made to help bring Hanna's mother to the United States from war-torn Kyiv, a quest that is ongoing. Bryant also encouraged Hanna to pursue United States citizenship, a goal which she happily attained on September 25, 2024.

In 2019, Hanna gave birth to their daughter Bella. As Bella grew from infant to toddler, Bryant and Hanna noticed that she was experiencing developmental challenges including difficulty forming emotional connections. After consulting with numerous specialists, Bella was diagnosed with Autism Spectrum Disorder (ASD). This has been a difficult time for their family, but as he has done with other challenges Bryant doubled down on his commitment. In order to support the family and ensure that Bella has access to the treatment she needs, Bryant has worked for the past several years as roofing inspector. The job comes with long hours and a great physical toll from carrying ladders and equipment and climbing up and down from rooftops. As Hanna states, "Bryant has always been deeply committed to providing for our family and ensuring Bella has the specialized care she needs ... Despite his exhausting schedule, Bryant has remained hands-on with Bella's care and has even completed parent training sessions for her therapy. He is an incredible father who has always prioritized our daughter's needs." **Exhibit A**, p. 14.

Understandably, Hanna has great anxiety over a future without Bryant. In spite of the stress and difficulties of the past years, she has managed to pursue studies to become a Board Certified Behavioral Analyst (BCBA) with the goal of providing care not only for Bella but other children with ASD. She hopes in the future to pursue a master's degree in behavioral analysis but is unsure how she will manage that feat as a single parent without Bryant's support.

4. Service to community

Between and during his periods of active duty as a Marine, Bryant has strived to be a positive contributor to his community. As a resident of Scottsdale, Arizona, Bryant became an Arizona Police Standards certified general instructor and served as a volunteer court officer for the Maricopa County Sheriff's Office, serving warrants and assisting with other court business. He also was appointed to the Maricopa County Sheriff's Posse where he was able to assist with apprehending fugitives and could act in the capacity of a Deputy in certain emergent situations until sworn personnel could arrive on scene.

Bryant is also a lifelong enthusiast of the game of football. For many years, he served youth in his community as a coach for Pop Warner football even though he did not have a child of his own on the team, even bringing one team to the national finals at Disney World in Orlando, Florida. He has been an ardent supporter of women's professional football, serving in management for Texas Elite Women's Football team and as the Head Coach of the Phoenix Prowlers in the Women's National Football Conference. In addition, he has volunteered his time and efforts for numerous charitable organizations, including working with the Make-A-Wish Foundation and serving for over 5 years on the Board of Directors for Every Kid Counts, Inc. Children's Charity. See, **Exhibit B**, p. 7.

B. Nature and circumstances of the offense

Bryant Sewall never set out to devise a scheme to defraud. He believed he was joining a company, not a conspiracy. And he never believed that Mediatrix and Blue Isle were anything but legitimate businesses designed to turn a profit while earning positive returns for their investor customers.

Approximately 8 years before he joined Mediatrix and while he was still in the Marine Corps, Bryant Sewall met Michael Stewart when he quite randomly attended a presentation Mr. Stewart was giving on Forex trading. Mr. Sewall was deeply interested in what he learned about the topic, and after the presentation he and Stewart connected over their shared experience in the United States Marine Corps. This, ironically, was the genesis of Mr. Sewall's interest in Forex trading. While Mr. Stewart and Mr. Sewall did not become close at that point, they kept in touch superficially, and as Mr. Sewall's interest in Forex trading grew they would sometimes discuss the topic. In the years that followed, Mr. Sewall continued to learn everything he could about trading Forex and eventually developed his interest and expertise in trading using "expert advisors" – algorithm-based computer programs that could be customized and improve trading efficiency and success through automation. As Mr. Sewall neared 30 years of service in the Marine Corps, he began to hope that making a living trading Forex could be his next career when that chapter ended.

Mr. Sewall did not form Mediatrix or Blue Isle, the companies at the center of this case. Those companies were formed by Michael Stewart and Michael Young before Mr. Sewall had any idea that they existed. In 2015, Mr. Sewall met Mr. Stewart for coffee, as friends do, and told him about his experiences and successes trading Forex using the algorithms he had been developing and customizing. Mr. Sewall did not do this with the intent of "pitching" Mr. Stewart on his system or forming a business relationship. He was simply having a conversation with a friend about a topic of shared interest. Shortly after that meeting, Stewart approached Mr. Sewall and told him that he and his longtime business partner, Michael Young, were forming a trading company called Mediatrix to manage client accounts and that they would like to hire Mr. Sewall to use his algorithm in the role of Head Trader for the company. Moreover, Stewart told Mr.

Sewall that in order to eliminate the problems with trade execution and corrupt practices that both he and Sewall had experienced with brokerages they had worked with in the past, Stewart and Young were also forming their own brokerage – Blue Isle. Mr. Sewall was beyond flattered. It was a dream opportunity for his post-military life and he enthusiastically accepted.

To the extent people were deceived about Mediatrix and Blue Isle, Mr. Sewall was the first in time. Critically, Stewart did not tell Mr. Sewall that earlier in 2015 he and Young had operated a Forex trading company – under the name Mediatrix no less – and had lost \$500,000 of client money in a matter of months. Similarly, Stewart did not tell Mr. Sewall about the multiple previous businesses (in oil and gas and other industries) that he and Mr. Young had tried to get off the ground but that uniformly had flopped. Had Mr. Sewall been told of these failures he would never have agreed to join Mediatrix. While Mr. Sewall did not know Young, he believed (wrongly) that Stewart had great business acumen. Mr. Sewall had first met Stewart in the context of Stewart teaching acolytes about Forex trading, holding himself out to be an authority on the subject. He naively assumed that Stewart possessed the knowledge and experience to make him capable of running a brokerage successfully and in full compliance with applicable laws and regulations.

Most of the aspects of Mediatrix and Blue Isle that the government argues were central to facilitating a fraud were put into place before Mr. Sewall joined the company. Stewart and Young had the idea to form a brokerage and took the steps to incorporate and operate it “offshore.” The decision to operate outside the United States did not strike Mr. Sewall as nefarious or even suspicious. For the entire time he had been trading Forex, Mr. Sewall had done so at offshore brokerages due to the National Futures Association’s prohibition on hedging at U.S. brokerages. Mr. Sewall viewed the ability to hedge trades as critical to his overall Forex

strategy. While NFA takes the position that hedging implicates potential for abuse and provides no economic benefit, Mr. Sewall was certainly not alone in disagreeing. When the NFA entertained debate on its proposal to ban hedging in 2008, it noted that many in the Forex industry opposed the regulation because the practice “provides a trading strategy benefit” by “allow[ing] customers to pursue both a long-term and a short-term trading strategy in the same currency” and “provided an economic benefit by “allow[ing] customers to maintain a directional position by lowering their margin requirements when the position goes against them⁴.”

Regardless of where one lands on the debate, the fact remains that many Forex traders have historically avoided U.S. brokerages, which are the only brokerages worldwide that are subject to the anti-hedging rule. To Mr. Sewall, his partners’ decision to locate the operation offshore was a logical and necessary step.

Similarly, Stewart and Young formed the “prime broker” relationship with Divisa/Equiti prior to enlisting Mr. Sewall to be the trader and formalized the agreement at a 2015 meeting in Miami at which Mr. Sewall was not present. Stewart worked with Equiti US principals to select the “white label” MT4 platform used to execute trades, as well as the Panda PAMM plugin that allowed only trades that were closed on the master trading accounts to be allocated to Mediatrix’s customers.

With respect to this “closed P&L” that prevented customers visibility to open trade positions, Mr. Sewall was part of the company when it was adopted but he had no reason to believe that its purpose was to deceive customers. As Young testified at trial, someone at

⁴ Letter from NFA General Counsel to CFTC commissioners re: Proposed Adoption of Compliance Rule 2-43, December 9, 2008.

https://www.nfa.futures.org/news/pdf/cftc/cr2_43_forexpriceadj_112408.pdf

Mediatrix received an email from an individual who had observed the company's trade activity and demonstrated an ability to "reverse engineer" or copy the company's trade strategy. There is no reason to believe it would have been Sewall who received that email. When the decision was made to protect against theft of the company's most critical intellectual property, Mr. Sewall had no reason to doubt the validity of that explanation. Further, other witnesses such as Gaurav Patel and Gary Dennison testified that use of a closed P&L to guard against reverse engineering is common in the industry. Mr. Sewall also took assurances from the fact that Panda PAMM, a trade allocation software solution that is ubiquitous in the industry, provides the closed P&L option, and that Mediatrix's Compliance Officer Brian King signed off on the procedure (Young testimony, Doc. 339, p. 84).

Prior to joining Mediatrix, Mr. Sewall had spent 30 years in the military where the overriding ethos is for each individual to understand his role, do his job, and rely on others to do the same. Mr. Sewall brought this mindset to his job at Mediatrix. As numerous witnesses testified, Mr. Sewall's sole function in the organization was to execute the trading strategy. With Forex markets that are open 24 hours a day, 5 days a week, that role left time for little else. Both his natural lean towards the "military way" and the practicalities of the situation dictated that Mr. Sewall rely heavily on his partners and other employees of Mediatrix to conduct business in full compliance with laws and regulations.

And rely he did. Mr. Sewall relied on the assurances of Stewart and Brian King, the Compliance Officer, that the fact that Mediatrix used a closed P&L system was fully disclosed to all of Mediatrix's customers. He relied on Stewart and Young to produce and provide clients with marketing and disclosure documents that would not be inaccurate or misleading. He relied on Stewart and Young's assurances that, with few exceptions, Mediatrix was only marketed to

qualified non-U.S. investors or U.S. citizens who were ECPs⁵. He relied on Young to market the company to investors truthfully and ethically and he relied on Stewart to manage the company's banking operations in the same manner. When Mr. Sewall was told that the company employed "P&L swaps" where funds wired by clients were retained rather than forwarded to the brokerage in exchange for brokerage funds that he believed belonged to Blue Isle, he relied on the fact that the company had hired a full-time compliance officer to reassure himself that the practice was fully above board.

Perhaps most importantly, Mr. Sewall was given a sense of security by the third-party verifications that the government argues were a central feature of a fraudulent scheme. Plainly, Mr. Sewall had nothing whatsoever to do with arranging for analysis by HedgeAlytix or "audits" or reports by accounting firms KPMG and Grant Thornton. Mr. Sewall was not included in any email correspondence with any of these firms, and he was uninvolved in determining what information would be provided to them. He would have been shocked to learn that Mr. Stewart provided these entities with anything less than full disclosure of all information relevant to the company's performance, or that such well-respected firms would produce even a limited, non-"audit" report without demanding the same. When those firms released reports verifying the same trading results that he saw on the MT4 master accounts and MyFxBook, he was reassured in the same way that the investors were.

For his part, Mr. Sewall too was not as prepared as he needed to be for the kind of trading the company engaged in with its prime broker, Equiti/Divisa. In his entire Forex trading career, whether trading for himself or managing the accounts of others, Mr. Sewall had only participated

⁵ An eligible contract participant (ECP) is an individual or an entity permitted to engage in certain financial transactions that are not open to the average investor. ECPs are often corporations, partnerships, organizations, trusts, brokerage firms, or investors that have total assets in the millions.

in “retail” trading. He had never utilized a coverage account like the system Divisa/Equiti employed. The trades and positions reflected in his MT4 terminal were the only truth that existed with respect to his trades. Further, Mr. Sewall had always traded at non-U.S. brokerages to avoid application of the anti-hedging FIFO rule. In his prior trading, when his MT4 terminal reflected positions in both directions, that reflected the reality of the positions he held in the market. The history of his trading experience mirrored what was shown in the master accounts on the MT4 terminal provided by Divisa/Equiti. That there would be a second set of accounts, the “coverage” accounts, where the same trade positions that his terminal showed as open were automatically closed and no longer existed in the market, was entirely foreign to him. Regardless, Mr. Sewall continued to believe that the master accounts that were allocated to the investors via the Panda PAMM were the only way to measure trading performance for individual clients, as the coverage accounts included funds of *all* clients as well as “house accounts.”

While the jury may have credited the government’s trial theory that Mr. Sewall deliberately misled Young so that he would relay false information to investors, Mr. Sewall respectfully disagrees. Young testified more than once at trial that he had minimal contacts with Mr. Sewall and that the source of his information concerning trade activity and other aspects of the business was overwhelmingly Michael Stewart. Further, when Mr. Sewall said something to Young in a Skype chat concerning the company having 53 consecutive months of gains, he fully and objectively believed this to be accurate. In all of Mr. Sewall’s experience as a trader, he had regarded *closed trades* as the measure of profit and loss. Open trades were “floating” and might ultimately be a gain or a loss. With respect to Mediatrix/Blue Isle, Mr. Sewall believed to the very end that if they could fix problems with Equiti and/or move to another broker, his system would eventually be able to close enough positive trades to overcome the drawdown. Notably,

Mr. Sewall never stopped trying to prod Equiti into correcting trade execution errors and lifting the limits that were preventing his system from operating profitably. Further, and contrary to the government's position, the evidence showed that Mr. Sewall's complaint was not with the limits in and of themselves, but the fact that the limits were imposed at a time when the positions already exceeded them.

Mr. Sewall greatly regrets that investors, some of whom were his colleagues and friends, lost money investing with his trading system. His participation in Mediatrix was never intended to take money from people wrongfully. Having lived his life with integrity, he would simply never have set out to defraud others. Mr. Sewall's only goal in this case was for his trading system to succeed and to make profits for the investors. He believed from the first day to the very last that Mediatrix would be successful, and he never stopped fighting to overcome the obstacles he saw in the way of that outcome.

C. The need to avoid unwarranted sentencing disparity

Section 3553(a)(6) mandates consideration of the need to avoid unwarranted sentence disparities among defendants with similar records who have been found guilty of similar conduct. It follows that a district court may also properly account for unwarranted disparities between codefendants who are similarly situated, and that the district court may compare defendants when deciding a sentence. *See U.S. v. Smart*, 518 F.3d 800, 805 (10th Cir. 2008).

Here, the biggest disparity, which can be cured by the Court imposing the sentence requested by Mr. Sewall, is that the Government seeks a sentence for Mr. Sewall that is 28 times the sentence imposed for an equally culpable participant, Michael Young. According to the testimony at trial, Mr. Young and Mr. Sewall played a separate but equally culpable role in the offense: Mr. Young, the CEO of Mediatrix, made false representations to potential investors in

order to keep the money coming in, and Mr. Sewall traded the portion of that money that was deposited into the brokerage account by the head of the operation, Michael Stewart. In its Sentencing Statement, the Government argued:

[Michael Young] was the mouthpiece for a \$129 million dollar off-shore fraud scheme from which he and his partners pocketed approximately \$40 million.... Although the scheme targeted many individuals of high net worth, [Mr. Young] also personally recruited working class people to invest in the scheme...[Mr. Young] affirmatively misrepresented to every investor he spoke with that Mediatrix as a company dated back to 2013 (a lie) and had operated since then with no investor losses (also a lie)...[E]ven though [Mr. Young] knew enough to know that there were serious problems with this “world class” forex trading program, he kept using his considerable talents as a salesman to prop up the fraudulent enterprise that was his sole source of income.

Government’s Sentencing Statement, *United States v. Young*, 20-cr-00349-REB, Doc. 40.

The Government cannot justify the disparate requests in sentencing between Michael Young and Mr. Sewall by arguing that Mr. Young was not part of the Mediatrix conspiracy. As the Government has repeatedly argued, Mr. Young’s “betrayal of trust” is “not just about a lie to the SEC.” Doc. 396-1 at 29. As they stated at Mr. Young’s sentencing hearing: “Mr. Young could have been sitting in Judge Martinez’s courtroom charged with the very same fraud as his defendants, because he made statements that were material to that fraud: these statements about Mediatrix’s founding, and about whether or not it ever had any monthly losses.” Doc. 396-1 at 25-26.

The sole meaningful difference between Mr. Young and Mr. Sewall is that Mr. Young cooperated with the Government. And while cooperation is worth some degree of lenity, it certainly does not give rise to a sentence that is 28 times less than that of Mr. Sewall, as requested by the Government, or 25 times less as requested by probation. This is especially true where, as here, the Government conceded in open court that they would have obtained convictions against Mr. Stewart and Mr. Sewall without Mr. Young’s testimony. Doc. 396-1 at p.

23-24. Here, Mr. Sewall moves this Court for a sentence of 24 months imprisonment, which is twice the sentence handed down to Mr. Young. This difference should adequately account for the difference in their culpability due to Mr. Young's cooperation, which was not critical to the Government in obtaining convictions.

While perhaps less probative here, it is worth noting the sentences handed down in a small sampling of other notable recent cases in which executives were found guilty of defrauding investors out of sums substantially greater than the loss in this case:

1. Sam Bankman-Fried, founder of the crypto-currency exchange company FTX, was sentenced to 25 years imprisonment for a fraud with an estimated loss of approximately \$3 billion.⁶
2. Rishi Shah, CEO of Outcome Health, was sentenced to seven years and six months in prison for his role in obtaining \$1 billion in fraudulent loans, resulting in hundreds of millions in unlawfully obtained dividends to himself and his partners.⁷
3. Elizabeth Holmes, founder of Theranos, was sentenced to 135 months after being found guilty of defrauding investors out of over \$140 million.⁸

Nothing about Mr. Sewall or his role in the offense warrants a sentence anywhere near or greater than these few examples.⁹ Mr. Sewall's decision to go to trial cannot justify the sentence requested by the Government when compared to other cases. Nor can the high loss in this case,

⁶ See <https://www.justice.gov/opa/pr/samuel-bankman-fried-sentenced-25-years-his-orchestration-multiple-fraudulent-schemes> (last checked November 7, 2024).

⁷ See <https://www.justice.gov/opa/pr/three-former-executives-sentenced-1b-corporate-fraud-scheme> (last checked November 7, 2024).

⁸ See <https://www.justice.gov/usao-ndca/pr/elizabeth-holmes-sentenced-more-11-years-defrauding-theranos-investors-hundreds> (last checked November 7, 2024).

⁹ See also Defendant Stewart's Motion for Non-Guideline Sentence and Sentencing Statement, Doc. 396 at p. 15 for other sentencing examples within the District of Colorado that further call into question the fairness and equity of the sentence requested by the Government in this case.

because loss is a highly imperfect measure of the seriousness of an offense. This is captured in the commentary to §2B1.1, which acknowledges there may be cases in which the offense level determined under this guideline substantially overstates the seriousness of the offense and that in “such cases, a downward departure may be warranted.” USSG §2B1.1, comment. (n. 21(C)).

IV. Conclusion

For the reasons stated herein, Mr. Sewall respectfully moves this Court to impose a below-guideline sentence of not more than 24 months imprisonment.

Respectfully submitted,

s/Thomas R. Ward
Thomas R. Ward
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s/ Lindsay N. Brown
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lindsay@browneeducationlaw.com

Attorneys for Defendant Bryant Sewall

Date: November 8, 2024

CERTIFICATE OF SERVICE

I hereby certify that on Friday, November 8, 2024, I filed the foregoing **DEFENDANT SEWALL'S MOTION FOR BELOW GUIDELINE SENTENCE** with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all counsel of record.

s/ Thomas R. Ward

Thomas R. Ward

Attorney for Defendant

BARBARA SEWALL YOSS

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NOVEMBER 6, 2024

SENIOR JUDGE WILLIAM J. MARTINEZ

UNITED STATES DISTRICT COURT

DISTRICT OF COLORADO

901 19TH STREET

DENVER, CO 80294

RE: BRYANT EDWIN SEWALL

Dear Judge Martinez,

Please let me introduce myself. My name is, Barbara Sewall Yoss (age 66), and I am the sister of Bryant Edwin Sewall. My parents are William Bryant Sewall (deceased) and Beverley Dyer Sewall (age 87). I have two siblings, Belinda Katherine Sewall (deceased) and Bryant Edwin Sewall (age 57).

I have known Bryant my entire life as he was born when I was nine years old. He was born in 1966 after the death of my sister, Belinda, from a car accident. The birth of Bryant was very special as both my parents and myself were grieving the loss of their daughter, my sister. Bryant was born at Baylor Hospital in Dallas, Texas which was the same hospital where my father was born.

When Bryant was three years old, we moved from the Dallas area to Pompano Beach, Florida and lived there until I graduated from high school in 1975. My father was an airline pilot for Braniff International and my mom was a stay-at-home mom. It was a wonderful life filled with the family-wide enjoyment of the weather and outdoor activities.

The summer of 1975 the family moved back to the Dallas area to be closer to extended family that were growing older and needed more attention. Both our maternal & paternal grandparents lived in the Dallas area and our parents needed to spend time with them due to health issues. Once back in our hometown Bryant was enrolled in Trinity Christian Academy in Addison, Texas. He was a good student and an avid athlete. He played football in the Fall and ran track in the Spring for many years. He was also part of the yearbook team as well as the school photographer. Bryant excelled at football and earned many awards.

After graduation in 1984, Bryant attended Austin College in Sherman, Texas. He played football, worked full time at UPS and took a full load of classes. Sherman is about 1 ½ hours from the Dallas area so the family was able to attend the home football games and see Bryant on a regular basis. He completed college in four years with a degree in Political Science and Business.

Upon college graduation, Bryant became an Officer in the Marine Corps. My father was a Navy pilot and had retired from the Naval Reserve as a Commander, so being in the military was a dream of my brother's. He always respected those that did something with their lives to benefit others. He has always been a gifted athlete and physically capable of doing just about anything without fear, so the military posed a special level of challenges he excelled at. He wanted to be among the Few and the Proud and choose the Marine Corps. Once Bryant graduated from Officer Candidate School, he was immediately sent to fight in the Gulf War. During Desert Storm he was among the first to enter Iraq as a Forward Observer. He was barely 21 when he was introduced to the rigors of war and the constant threat of death. He also participated in Iraqi Freedom many years later while in Special Operations and was attached to the British Division responsible for the city of Basra and its surrounding area. Over his many years in the Corps, he was stationed in numerous countries, promoted often and awarded many medals for his valor. Over the years Bryant traveled the world for the Marine Corps and had many different assignments.

When Bryant was not on assignment for the Marine Corps he lived in Scottsdale, Arizona. He loved the weather there as it reminded him of Florida where the weather is always great. While in Arizona he worked in telecommunications, the real estate/mortgage industry and as an Officer of the Court for Maricopa County serving warrants with the Maricopa County Sheriff. He was a top-level volunteer of The Sheriff's Posse of Maricopa County where he could act as a deputy until sworn personnel arrived on scene. He graduated from the POST Police Training standards course and was a trainer for the sheriff's department as well. Bryant was a coach for Pop Warner football and one year his team made it to the national finals at Disney World. He was always working with kids either in football or via charitable organizations like Make a Wish.

Bryant's last assignment as a Marine was at US Marine Forces EUCOM/AFRICOM in Stuttgart, Germany. He oversaw security for all the US Embassies on the continents of Europe and Africa. He reported to high level Generals and held a top Security Clearance. His last commander in Europe, Gen. Neller became Commandant of the Marine Corps. Another officer Bryant worked for several times, Gen. Jim Mattis became Secretary of Defense. Gen. Mattis was Bryant's first commander in Desert Storm and he learned a great deal from him and has always has great admiration for and tried to emulate the lessons learned from him. Bryant's blood runs deep for this country and he is a very proud Marine. During this last assignment in Germany Bryant met Hanna. Hanna was living in Vienna, Austria after she fled Ukraine due to the invasion of Crimea. Once Bryant met Hanna he was smitten and told the family he had found his future wife.

Around this time my Dad began to struggle with his heart/lung health. He had a previous heart attack followed by quadruple bypass surgery when my parents lived in Galveston, Texas. After Hurricane Rita in 2005 my parents decided to return to the Dallas area to be closer to family. My parents spent the last ten years on my Dad's life living in Plano, Texas where he passed away on November 21, 2015. Bryant was just completing his final tour in Europe but was able to make it back before Dad passed away.

Bryant had a home in Plano plus a place in Nassau, Bahamas once he retired from the Marine Corp. Since Hanna was not able to travel to the US yet, he had to have a place to spend time with her outside of the country where our family could get to as well. In September 2017, Bryant & Hanna married in Nassau, Bahamas. They continued to live in Nassau until Hurricane Dorian struck in 2019. By this time Hanna was pregnant with their daughter, Bella. The Bahamian government advised all non-citizens that hospital privileges would be revoked and only citizens would be afforded care at area hospitals due to the level of destruction of the country from the hurricane. Due to this, Bryant & Hanna decided to move to Kiev, Ukraine since Hanna still did not have a visa from the US. Hanna was a citizen of Ukraine and would be allowed to give birth in her home country. Bella was born on January 8, 2020. They maintained an apartment in downtown Kiev until moving to the US once Hanna's immigrant visa was approved after a significant delay due to Covid.

The Visa finally came through in February, 2021 and they relocated to Little Elm, Texas where the majority of the family had moved. Bryant found work as a supervisor for a moving company within a couple of days to get money coming in then as a project manager for a roofing company. He has remained in the roofing industry and today is a HAAG engineering certified roofing insurance inspector. He works six days a week and maintains a very low-key lifestyle.

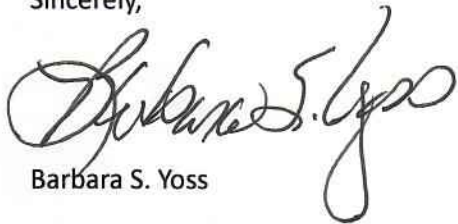
Bella & Hanna mean the world to Bryant. He waited most of his adult life to marry and Bryant absolutely adores Hanna. She is a tremendous mother and is studying to become a BCBA therapist to help children on the Autism Spectrum. Bryant and Hanna are as devoted parents as you will ever find. Bella has been diagnosed on the autism spectrum and requires special schooling. She is an excellent student and incredibly smart, she started reading at the age of two. Sometimes she struggles with her emotions and expressing herself but is making great improvement due to the diligence of Bryant & Hanna and her schooling. We are all hopeful Bella is on the path to going to main stream school at some point in the future.

Bryant is an honest, ethical person and would never involve himself with a business that was not legitimate. I have known my brother for his entire life and he is logical and pragmatic just like my father. He does his homework and does not engage in any activity unless he is assured it is correct & legal by people he trusts as experts in the industry. He did the very same thing his entire career in the Marine Corps which is no doubt why he was promoted to a very high rank. I am certain he would never do anything that would take him away from Hanna and Bella. He waited his entire life to have a family. Nothing is worth more than family to Bryant. He knows firsthand that life can be fleeting from his multiple combat deployments and the enormous amount of death he witnessed. I feel certain he was misled by his partners that he believed and trusted. I can assure you, he did not change his principles or his character he has had his entire life, when he went to work at Mediatrix. He followed the guidance of the people he trusted and did his best to overcome challenges and problems as he has done every day of his life and military career.

My Mom and I are struggling with his guilty verdict and impending incarceration. He is of tremendous importance to us and is necessary for Bella's future development. She adores her father and loves spending time with him. Bryant waited over fifty years to get married and have a family and now that he has one, he is looking at being separated from them. I know this is crushing to him. He is a model citizen and someone who has helped others his entire life. We will do our best to help Hanna & Bella but we are all devastated by the thought of losing him and all know in our hearts the kind of man he is and has been his entire life.

I plead for your leniency and ask that he be given the shortest possible sentence in deference to the decades of service and sacrifice he has already given to this country. Thank you for reading my letter. My hope is it will give you a better understanding of the wonderful man my brother is and the family he comes from.

Sincerely,

A handwritten signature in black ink, appearing to read "Barbara S. Yoss". The signature is written in a cursive, flowing style with a large loop at the end.

Barbara S. Yoss

September 17, 2024

Dear Honorable Judge Martinez,

This letter concerns our nephew, Bryant Sewall. As his aunt and uncle, we have observed him from his infancy to his adult life. Our family is fortunate in that we all lived near each other in the Dallas area for many years. Throughout his life, he was loved and nurtured by his parents, sister, grandparents, and his extended family.

As he entered early adulthood, we were impressed by his actions during his college years. At the time, he had to provide for the cost of his college education. He was also beginning his career in the military.

In Desert Storm, he was part of the Marine Corps who entered Kuwait in the initial battles of this conflict. Back home our children followed all the action and prayed for his safe return. Our daughter who was attending Texas A & M was especially concerned about him knowing that he was in such danger with fighting. He was also in harms way with the pollution from the oil wells fires. Again, he entered a dangerous conflict with Iraqi Freedom. Stepping up to the needs of his country has been a primary objective his entire life. He has served throughout his life as an honorable officer in the United States Marines.

In his last deployment in Europe, he met his future wife. We were so excited that he felt that when he retired from the military that he could commit to a family. He has always been dedicated to his parents and sister, but now he could have his own family.

Bryant has always held himself to high standards of physical fitness, healthy living, community involvement, and dedication to his family. He is a wonderful husband and father to a precious little girl.

Respectfully,



Tom and Marylou Buntyn

2803 North Spring Dr.

Richardson, Texas 75082

From: Lt Col Christopher John Parker MBE MA CMgr FCMI
Charmogen House, 120 High Street, Watchfield, Oxfordshire, SN68SW, England, UK

To: The Judge in the Case of Lt Col Bryant Sewall USMC

29 October 2024

Dear Sir/Madam,

I wish to write briefly to offer my personal concern about the case being made against Bryant. The allegations of long term calculated bad behaviour just do not match in any way the person whom I know very well from his approach to life on both combat operations and since as a friend.

I met Bryant during combat operations in the Invasion of Iraq in March to April 2003. We were together every hour in our roles, me as Chief Of Staff of the elite British Desert Rats (7th Armoured Brigade) and Bryant leading the USMC ANCLICO Unit attached to provide close air support. Our story there is less relevant but Bryant has a citation written by the British commanders for his outstanding professional, ethical approach to precision air bombing missions that unlocked Basra, a Saddam Hussein Forces held city of 1M people. His work saved thousands of lives. Bryant was widely respected by all for his impeccable integrity and selfless devotion to duty at the highest levels. He was a decade later asked as the sole US guest to the Desert Rats final dinner in Germany, a mark of his respect by all officers.

When he became successful afterwards and got married, I was happy for him. I visited him and was struck by how he cared for all the staff and team – notably for veterans to ensure others had their share of hard work bringing happiness. I have never had much time for the financial community and did feel concern that good men like Bryant can be used as a mask or even a prop for less ethical behaviours than we aspired to as men. I do not feel Bryant did this alleged wrong doing unless he was told it was correct by people whom he trusted but then misled him. The position is even more concerning as Bryant was well liked in the USMC – a world renowned, tight knit community whose ‘Semper Fidelis’ motto was always Bryant’s greeting to his comrades. I do not see any way in which a proud veteran would single out his closest friend then cheat them. I find it wholly likely that he did what I know the man to have done – look after his friends and help them enhance their savings. The latter is a noble act, the former a despicable one and I fear that there has been manipulation of Bryant. If there is guilt by association then I know from our closest talks in 2013 and 2014 that he shared no worries on his partners but when I asked him to beware others (we both share faith) then he agreed to keep alert for those who wish good men ill. His friends who have lost funds have been ordered to not contact him but are confused, upset but baffled as this simply does not add up. You do not invite your best friends to your wedding then help them all to join a false or evil scheme; Bryant would have simply not done that. It does not add up.

This letter is not meant to say anything other than I support justice and have done globally for 55 years. I am truly shocked at this whole episode. I cannot stand by and see a decent and talented man be punished for trusting others in what I assess was either naivety or lack of experience of what unethical activity was capable by other parties. If you wish me to join by video link again I shall do so as I wish to support your decision- making process in all I can do.

Yours Faithfully,





**THE AMERICAN LEGION
THE ELEGANT 18TH DISTRICT
PO Box 5256
EL MONTE, CALIFORNIA, 91734**

November 4, 2024

Honorable Judge Martinez,

It is with immeasurable enthusiasm that I vouch for the character of Bryant Sewall. He and I served together in the United States Marine Corps and were classmates at the United States Marine Corps Command and Staff College. Furthermore, we deployed with the 3D Air-Naval Gunfire Liaison Company for a combat tour to Iraq in 2003. He is a role model for integrity in every regard and constantly puts the rights and feelings of others before his own. I personally have seen him give money to fellow Marines who had fallen on challenging times. With that said, Bryant had no expectation of being paid back. Furthermore, he counseled many of our young Marines who were having personal problems and followed up with each of them to ensure they obtained proper treatment for their PTSD and marital issues.

As a husband and father, I have seen him display incredible love and devotion. He has an uncanny knack for balancing his family life with his professional life so that nothing is short-changed. To me, he has been a loyal friend who has displayed nothing but boundless kindness and devotion. His soft spot is that he is a very trusting individual who gives everyone the benefit of the doubt to everyone. At times he can even be a little gullible, as he wants to see the good in everyone and not the bad. Bryant is known by his closest friends as one who will give the shirt off his own back to help someone else. He was a strong but compassionate commander who had the complete respect of his colleagues both junior and senior. He was asked to stay as a ANGLICO Brigade commander, a Marine Corps special operations unit specializing in providing communications connections and Fire Support to foreign allies, by an unprecedented 3 ANGLICO commanders in a row due to his high level of proficiency in all areas. I have never seen or heard of that happen to any officer even once as Brigade commander billets are extremely coveted and there are only 15 such positions in the world, let alone being asked to remain 3 times by 3 different commanders.

As a senior Chief Warrant Officer, I was given the choice of who I wanted to serve with and I chose to serve under Bryant each time and would do so again and would put my life in his hands again without hesitation. I was not the only officer to do so. THE senior CWO5 in the entire United States Marine Corps, a Vietnam era veteran of great distinction, who was being requested to work for and deploy with several Generals, chose to serve under Bryant for his final deployment. As did two Navy commanders, both senior to Bryant in rank but chose to work for him because of the proficiency and unwavering integrity with which he conducted himself and led his unit. I am not greatly familiar with this case but I will tell you with complete assurance and total confidence that if something was being done wrong, Bryant was unaware or being told

by someone he trusted that it was being done correctly or he would absolutely not have participated. I have personally witnessed that level of integrity from him countless times over our service together and he will go to any length to fix a problem and overcome any obstacle. Even when others give up, Bryant will see it through and this perseverance and tenacity has served Bryant very well over his career and garnered him great respect from others. He is the epitome of a US Marine who will not leave anyone behind on any battlefield. His Navy Achievement Medal for Operation Iraqi freedom which admittedly should have been a Bronze Star but was made a NAM for speed and efficiency by the unit commander that did not want people to wait for years for awards, outlines just such action. I was there for the entire operation that citation references and saw those actions firsthand and it is not an exaggeration to say that in many regards, the success of that operation and the lives of countless people were saved due to the actions and perseverance of Bryant Sewall.

I pray that you will grant him compassion and to keep this fine man in our community and not in a cell because there would be no greater miscarriage of justice than for someone who has given so much to our country and operated in such an impeccable manner his entire life, to be taken away from his family and out of our society. I have worked with many, many men over my 3 decades of service to our country and in our community and I could name no finer man, I have ever met, than Bryant Sewall.

Very sincerely,

Neil T. La Sala
American Legion Department of California
District 18 Commander

Associated Services

Josh B Flynn

PO Box 431158 Houston, TX 77243

To: Honorable William J. Martinez

Subj: LtCol Bryant E. Sewall USMC

Dear Judge Martinez,

Your honor, I write to you in regard to case of Bryant Sewall. My name is Josh Flynn and I am a CPA and the current Secretary of the Republican Party in Harris county Texas. (Houston). I am married and have 5 children. I served in the United States Marine Corps and have served my nation in many forms in the Republican Party in Texas. I am alive today, because of Bryant Sewall.

When I first met Bryant, I was in high school and not doing well. I was harassed and bullied terribly and was struggling and had even contemplated suicide. I was able to join a new school where Bryant and a man named Kenton Getz were already students. Bryant found out from my sister, Tammy, that I would be coming to Trinity Christian Academy where he went to school in the following weeks and he got Kenton and came to get me to take me to a party so I would feel welcome and a part of my new school. That single action of kindness and concern for others, saved and changed my entire life and the lives of all of those around me.

Bryant is one of the most honest, selfless and wonderful people I have ever met in my life. He is a tremendous leader and devoted himself to service in the United States Marine Corps as an officer for over 3 decades. Very few people can say that. In addition, he served at the highest levels in the most dangerous jobs. All to serve his fellow man. His career can speak for itself and I am sure you will see that. But the sacrifice and devotion he has given to his country is something only a very, very few people ever do. He is one of the elite who did so and we should all be in his debt for giving his life and time to protect ours.

His integrity is impeccable. In over 40 years of friendship, going back to 1984, I have never ONCE seen Bryant do anything dishonest or even be the least bit suspect. He is always the one wearing the white hat and was an inspiration to me both in high school and long after. He was a very gifted athlete and one of the best football players our school has ever had. He played in college as well and at the semi pro level and then coached as well. His love for football and the lessons it teaches is tremendous and he has changed many lives, both men and women through his coaching. He was one of the pioneers that brought football to women and is one of the most influential people in that sport which has brought so much joy and enjoyment and lifelong friendships to so many young women.

He inspired me with his over 3 decades of service to our country. Then working with the Maricopa County Sheriffs office and then again, with several charities. Bryant is always looking out for others and would help others in any way possible. Over 40 years, I have not once, not ONE single time, seen anything from Bryant that is not the exact opposite of the charges I have read against him. That is simply not him and not anything he would do. I know that as well as I know my own name. My sister knows that. My family knows that. Everyone that knows Bryant knows that and I imagine you will have many letters from many people in all different walks of life, all saying that exact same thing to you. That is not Bryant. Not anything he would ever do. Certainly not knowingly. Bryant is loyal to a fault at times and if he listened to the wrong people that he trusted, he could easily go down the wrong road but trusting others is not a crime. Even when they are wrong. Bryant is one of the most gifted problems solvers I have even met. His ability to analyze problems and find solutions is uncanny. This combination means that he will fight until the very end to solve problems. My father, Dan Flynn, a Brigadier General in the Texas Guard, and a Texas state Representative, recognized this in Bryant and if he were alive today would write just as I am, that the honesty and integrity of Bryant is beyond reproach and he is someone anyone that knows him would trust with the lives, their families or their finances.

I know your time is valuable, but I could give you 40 years of stories of how Bryant did the same thing for others that he did for me. How he helped someone in need. Helped his fellow Marines that had fallen on hard times. Helped me when I had fallen on hard times. Helped my sister, when she had fallen on hard times. This is a man that if this had not happened, that many would have liked to see get into politics and would have backed him. He is a saint and a hero and someone that so many people have benefitted from. I am just one of many, many people that he has helped and made a difference for. I cannot emphasize enough how much this man is someone of the upmost honesty and I know with every cell in my body that he must have been told everything was being done correctly and he trusted those people or he would absolutely never be involved. Bryant is great at focus and doing his job and letting others do theirs. He would be focused on his part of the mission, and everything could be in flames around him but he would stay focused on his mission and make sure it was done as well as it could be or die trying.

I am sure people were hurt in this case and that is an important factor but I beg you to not destroy his life and that of his family as well. Bryant is an asset to our community and to our country as a whole. He has done FAR more good in this world than bad. I know from other military friends of his that thousands of lives were saved by his actions. He certainly saved mine for which I and my family are eternally grateful. He has made such a difference in the lives of many young people who needed guidance. He has helped those on the road who could not help themselves. He has done SO much good. That has to be a balance to the damage that has occurred. How much is just one of the lives he saved worth? How much is my life worth? I would submit to your honor that it is worth far more than any monetary damage in this case. Bryant has saved thousands of lives. That should more than balance out the damage caused.

I know this entire event has been traumatic for him and something for which he harbors great remorse and pain that anyone would be harmed by his actions. Knowingly or not. The damage was done, and he is devastated that he would be a part of anything that hurt others. When Hurricane Harvey devastated the Houston area, it had not even stopped raining before Bryant was on the phone offering to come down with his jetskis and anything we needed to help anyone that needed help. THAT is the Bryant I know. That is the kind of thing he always does.

I would ask your honor to take all of this into consideration. I am sure you have many other letters giving you many other stories and personal experience with the man Bryant is and his integrity and his devotion to service and to his community. The worst thing that could happen is for this fine man that has given so much to our country, be taken out of our community and away from his beloved family. His family is his world. He loves Hanna and Bella and the damage to them cannot be understated. The damage done to them can never be healed if Bryant is taken away. I implore your honor to please don't do that. Please grant compassion to Bryant and give him the absolute shortest possible sentence or better yet, none at all. I am sure there are many other penalties he is going to have to face from this and prison will in no way help those that were hurt or heal our community. It will only impose more harm and be of no deterrent factor as Bryant has lost so much of his trust in others and would never participate in anything like this again. He has suffered enough already. His family has. His innocent daughter has. Please, sir, I pray with all my heart to show mercy upon Bryant and his family.

Thank you for your time and for listening to my plea for Bryant. If you find as I and I am sure many others have asked on his behalf, it will be a decision you can always know was right and just.

Cordially,

JB Flynn

Gerald B Turley
215 E. 4th St
Eagar, AZ. 85925
602-615-6371
gturley@vccusa.com

To whom it may concern,

I have known Bryant Sewall for almost 30 years and feel I am qualified to state that he is an honorable, trustworthy man. I have seen him in many circumstances make the right and honest choice in both professional and personal settings. I have witnessed first-hand his leaving a safe life to serve and protect his country knowing he would lose personal wealth and standing in his nonmilitary profession. I have seen him sacrifice both time and money to further the sport of Women's Professional Football. His passion both on and off the field would be hard to surpass. In this sporting setting there were ample opportunities to take advantage of others' dreams and ambitions. I witnessed others abusing coaches and players physically and financially. Bryant always made sure his actions protected those he worked with and especially those he coached. His administrative efforts both with the Arizona Caliente and the Phoenix Prowlers were above board and meticulously honest. In any circumstance as an offensive coordinator, he always prescribes honesty and integrity and followed up to make sure our actions as coaches were consistent with his personal standards. This leadership was admired by me as a head coach and by others who assisted underneath us. While owning and coaching his own team I jumped at the opportunity to step in under his administrative efforts to coach for him. I did this because he is a good person and someone I could trust with my own reputation. I would trust this man with my pocketbook, my family, and as previously stated my reputation.

I know Bryant is an incredible family man. He would never jeopardize his family for anything. He is loyal to a fault and holds his family in as high regards as the USMC. He will always be loyal to his wife and daughter just like he is loyal to his God and country....and his fellow Marines. His service to his country like his family cannot be highlighted enough. He has put his life on the line for his friends, family, and country. He has put his life on the line for those in foreign countries and the citizens in those countries. He is a hero in my eyes and in the eyes of the hundreds if not thousands of people that have seen his efforts and who have watched him pack his life up and store it away while he served without regard for his own life.

Should you have any questions or if I can help in any way to shed light upon the type of man Bryant is or the high moral values, he possesses please contact me.

Thank you for your time and efforts,

Sincerely,

Gerald B Turley.

Hanna Sewall

1199 Lloyds Road
Little Elm, 75068
11.03.2024

Senior Judge William J. Martinez

United States District Court
District of Colorado
901 19th Street
Denver, CO 80294

Dear Judge Martinez,

My name is Hanna Sewall, and I am the wife of Bryant Edwin Sewall. I am originally from Donetsk region in Ukraine, and I met Bryant in 2014 while he was stationed in Germany on active duty. At the time, he was a Marine Lieutenant Colonel with nearly three decades of service to his country. I was immediately impressed by his strength, integrity, and kindness, qualities that continue to define him in every role he undertakes. After dating for several years, we married in 2017. Since then, Bryant has been my strongest support and an exceptional partner and father.

When I met Bryant, I was new to Europe, having fled my home region of Donetsk due to the outbreak of war in early 2014. Although I managed to leave soon after graduating university, my family stayed behind, and I was left with constant worry over their safety. Bryant has known about my family's situation from the beginning, and he has always supported me in caring for them from afar. Today, we are working hard to bring my mother to the U.S. from Kyiv to help her start a new, safer life here with us.

In 2019, just before the birth of our daughter, Bella, Bryant became involved in the legal case for which he now faces sentencing. This case has cast a shadow over our family, bringing unimaginable stress into our lives. I was pregnant when the charges arose, and I believe the anxiety I endured took a toll on my health and affected my pregnancy. Bella was born sick, and it broke our hearts to see her in the hospital for her first six days of life. As she grew, we noticed developmental challenges, including difficulty forming emotional connections, responding to her name, and interacting with others.

After consulting numerous specialists, we eventually received a diagnosis of autism. It was a devastating time for us. The fear of losing my home country and the stress from Bryant's case were overwhelming, but learning of our daughter's diagnosis pushed me to my breaking point. Bryant has been my rock through it all, offering constant support and encouragement, even as he faced his own stressors. With his help, I found the strength to fight for our daughter's future, dedicating myself to her care and development.

Bryant has always been deeply committed to providing for our family and ensuring Bella has the specialized care she needs. After we moved to the U.S. in 2021, Bryant took jobs as a mover and later as a roofing supervisor to support us. These were long, physically demanding hours, yet he did whatever it took to make sure Bella could access ABA therapy, developmental programs, and other resources essential to her progress. Despite his exhausting schedule, Bryant has remained hands-on with Bella's care and has even completed parent training sessions for her therapy. He is an incredible father who has always prioritized our daughter's needs.

While caring for Bella has required much sacrifice, I have been inspired by her progress and motivated to work as a registered behavioral technician helping other children with autism. This job has not only helped me find a sense of purpose, but it has also deepened my understanding of the needs of children with autism. I hope to pursue a master's degree in behavioral analysis, and Bryant has offered to support me with Bella's care so I can continue this path.

Our daughter is now nearly five years old and thriving due to the stability and dedication both of us provide. She attends ABA therapy from 9 a.m. to 3:30 p.m., and with Bryant's help adjusting his schedule, I am able to work full-time. However, if Bryant is incarcerated, our family's stability will be severely compromised. Without his income and support, I would struggle to maintain my full-time job, which is essential for Bella's insurance coverage and access to therapy. I fear the disruption of losing both her father's presence and her ABA services would be deeply traumatic for Bella, setting back the progress she has made.

Judge Martinez, Bryant has spent his life serving others. He dedicated nearly 30 years to the Marine Corps, risked his life multiple times for his country, and has been a pillar of support for our family through every hardship. I plead with you to consider his service, integrity, and the importance of his role in our family as you decide his sentence. Our lives, especially Bella's, would be drastically impacted by his absence. Bryant is not only my husband and Bella's father; he is our anchor, and losing him would be a devastating loss for us both.

Thank you very much for considering this letter. I hope it provides a glimpse into the life Bryant has built for us and the invaluable role he plays in our family.

Sincerely,

Hanna Sewall

469-430-4890

hanna93sewall@gmail.com



DR. GENE A. GETZ
PRESIDENT
CENTER FOR CHURCH RENEWAL

November 3, 2024

The Hon. William J. Martinez
U.S. District Court

Dear Sir:

I have had the privilege of personally serving as pastor to Bryant Sewall as well as to his parents for a number of years. They were faithful members of Fellowship Bible Church.

Bryant went on to graduate from Trinity Christian Academy, a well-known undergraduate institution. This in itself is a tribute to his character.

In all the years I've known Bryant, I have no reason to question his honesty and integrity. He has also been a dedicated husband to his wife and father to his daughter.

With all due respect, sir, I would request that you give special attention to not only my words of affirmation regarding Bryant's character, but to the witness of a number of others who know him well.

Thank you for your attention to this matter.

Most sincerely,

Gene A. Getz, Ph.D.
Pastor Emeritus, Fellowship Bible Church North
Director of the Center for Church Renewal

VISIT OUR WEBSITE AT WWW.BIBLEPRINCIPLES.ORG

241 Legacy Drive, Plano, TX 75023
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October 31, 2024

The Honorable William J. Martinez
United States District JudgeRE: Bryant E. Sewall
United States v. Bryant E. Sewall
Extenuation & Mitigation

Good day, Judge Martinez:

I am writing you in defense of the character of a close personal friend: Bryant E. Sewall.

I write both personally and professionally. I have known Bryant since 1989 when we met while checking into the basic infantry school for Marine Corps officers in Quantico, Virginia. Subsumed within the training we received there was a constant emphasis on integrity and fidelity. Now as then, Bryant manifests faithfulness to a fault and scrupulous honesty. We bonded over common recreational interests in addition to the months of twelve-hour days; yet, even then, Bryant's determination to persevere over emergent life challenges demonstrated as well as developed character. I particularly remember Bryant suffering an injury that forced him to rotate back to a later training company rather than be medically discharged – he healed, he performed, and he advanced.

Bryant subsequently served with distinction in the Gulf War, providing critical forward support to a battalion commander who later became the Secretary of Defense. During his Marine Corps career, Bryant always took on the more challenging roles, moving into special operations, and putting his life on the line countless times for our country. Bryant was critical to the success of several, very high profile, national security missions in Iraq, during which he garnered tremendous respect for his ingenuity, devotion to duty and integrity -- from U.S. forces and allies alike. When not the duty expert, he listened to those that were and followed their direction.

Yet he would occasionally motivate me, ultimately encouraging – even mentoring – me, into transitioning back into the Marine Reserves in the mid 1990's and culminating upon my retirement in 2017 with over twenty-seven years of service. I'm not saying that I gave greatly or did more than my mere part; but I can count on one hand the people influential in getting me back into the service of our country – and Bryant is one of them. Then as now, Bryant always looked out for others – whether young Marines in his charge, engaged forces needing his support, or family and friends seeking his guidance.

Bryant E. Sewall - Extenuation & Mitigation
October 31, 2024
Page 2

From my experience with Bryant over 30 years, none of what I have heard of this case makes any sense and is frankly unbelievable. He has always acted honorably in business as he did in the Marines. In his professional experience as well as his Marine Corps service, his sacrifices put his country over his career. When we both lived in the Phoenix, Arizona area, Bryant volunteered with the Maricopa County Sheriff's Office, giving his time and risking his life to serve and protect our community. I do not know many people willing to take on -- as an unpaid volunteer -- the training and tasks of regular sworn personnel.

In the entire time we have known each other, Bryant has never shown even the smallest inclination to do anything but follow the rules and do the right thing. When I read the accusations, I could not fathom how Bryant got dragged into a federal case based on the actions of his company's CEO and COO. I have no doubt that Bryant was informed that everything at the firm was being done properly; because if it was not, he would have demanded that the situation be corrected immediately or he would have disassociated himself from the firm.

On top of being loyal and faithful, he is trusting of others and looks for the good in everyone. I am entreating Your Honor to consider that Bryant Sewall has been, is presently, and will again be able to lead a law-abiding life in service to his family and society if the findings are overturned on appeal, set aside, or mitigated in some form of post-conviction relief; and, from my experience, professionally and personally, all constituencies would be thus better served.

Respectfully submitted,

Sincerely


Jon F. Reynolds, Jr.

Kenton G. Getz
2822 Woods Lane
Garland, TX 75044
kentongetz@mail.com

November 3, 2024

Honorable William J. Martinez
U.S. District Court, Colorado

Dear Judge Martinez:

I hope this letter finds you well. I am writing to you regarding the upcoming sentencing of Bryant Sewall. I have had the privilege of knowing Bryant since high school, and I feel compelled to share my perspective on his character and the contributions he has made throughout his life.

Bryant has always been a person of integrity and honor. Growing up together, we attended the same church, where I witnessed his commitment to serving others and living a life guided by strong moral principles. His dedication to helping those in need, along with his unwavering work ethic, has consistently set him apart as a role model in our community.

As an example of his character and his concern for others, Bryant became aware of a new classmate, Josh Flynn, that was transferring to our high school. Bryant wanted to make sure that Josh was welcomed to our class before he even stepped foot on the school property. Bryant had the idea for us to go to Josh's house and take him with us to our junior class Halloween party for Trinity Christian Academy.

Bryant became aware that Josh was transferring to our school in the middle of the fall semester. Josh's sister was already at our high school, and she let Bryant know that her brother was transferring to our class and that he did not know anyone at our school. That is when Bryant suggested to me that we pick up Josh at his house and take him to our class party and introduce him to our classmates. Josh became one of Bryant's and my best friend. Josh was overwhelmed that we would show up at his house and take him to our party before we had even met.

In the years since this event, I had a conversation with Josh, and he shared how that simple gesture saved his life. What Bryant and I did not realize is that Josh had been ridiculed at his previous high school and was subjected to a vicious rumor mill that had devastated him. He had been considering suicide when his father took him out of school and enrolled him at Trinity Christian Academy.

Bryant was just being Bryant and wanted to make sure that Josh felt welcomed to our class and wanted to make sure he had friends when he showed up for school. Without Bryant's leadership and concern for a new classmate, Josh's experience would have been extremely different and filled with anxiety on his first day of class at Trinity. But instead, Josh was touched by our kindness and welcomed to our class because Bryant thought about Josh and made sure he was introduced and connected to friends from day one at TCA.

After college, Bryant served with distinction in the United States Marines. His time in the military not only reflects his courage and commitment to our country, but it also shaped him into a person who values discipline, responsibility, and service. The values he learned and practiced as a Marine have been a significant part of his character throughout his life.

As an example of Bryant's dedication to his faith and commitment to helping others, Bryant came to our church youth group and shared with our Jr High students. I was the pastor of our Jr High ministry, and I asked Bryant to share the values he learned on his first call of duty in the Gulf War. He shared how God protected him, and his platoon. He encouraged our students to follow Jesus and put Jesus first in their lives. Bryant's willingness to share from his experiences modeled to our students how to live with integrity in difficult circumstances and stay committed to Jesus Christ.

In all the years I have known Bryant, I have never known him to take advantage of anyone. He was always concerned for others and wanted people in his life to be honored. Later in his life, Bryant met his wife and asked if I would be in his wedding.

My wife and I were living in Dallas and were raising five children of our own and we were struggling financially. Bryant wanted us to be at his wedding and paid for our plane tickets and hotel room so I could be in his wedding and bring my wife, Carla. That was a gift to both of us. We did not have the resources to spend time away from our children. Bryant made it possible for us to have a mini vacation and focus on our relationship at the same time we were celebrating and participating in his marriage.

These are my personal experiences and examples of the character and compassion that Bryant exhibited for others. I consider it a privilege to write to you and share about my friend Bryant. I am heartbroken as a father thinking about Bryant's child growing up without Bryant in her life. I am also filled with deep sadness for Bryant's wife, Hanna, and the prospect of raising their daughter on her own.

I genuinely believe that leniency for Bryant will allow him to continue to show the kindness and compassion for others that I have experienced in my relationship with Bryant.

Thank you for considering this letter as you make your decision.

Sincerely,

Kenton Getz

Kenton Getz

October 22, 2024

Hon. William J. Martinez:

My name is Michael Yamamoto and I have known Mr. Sewall since 1995. I am in the mortgage industry and currently hold licenses in 26 states so I'm very familiar with compliance. I was the best man at his wedding, so I know Mr. Sewall very well. I worked with him in lending and real estate for many years as he held the real estate license for our company.

I first met him through some mutual friends when we played semi-pro football in Arizona. During our playing time together, he was a great teammate, hard worker and exceptional tactician and coach.

Over the years, I have witnessed him go on THREE active-duty combat tours to defend our country at the highest level, giving the majority of his adult life to protecting us against outside forces. The fact that he sacrificed his life for our freedom and safety in the US, should really be enough, in and of itself. This is, in addition, to years of reserve duty with the Marine Corps training multiple levels of the armed forces to do the same.

Mr. Sewall was part of my youth football staff for over a decade as a volunteer coach and mentor to hundreds of young men starting with my oldest son and finishing with my youngest son from 2004 on. He had no children in the program, yet he volunteered his time and money to support those kids during that time. It's hard enough to get a parent to help out their own kids, let alone a volunteer with no "skin in the game". Yet, he gave up his nights and weekends to game plan, watch film, coach, etc. anytime he was able.

Mr. Sewall also started the first women's football league and had a team in AZ to help and support women who wanted to play the game in a safe and controlled environment. He had teams in AZ and TX and helped many young women benefit from the game and life lessons that football brings with it. He used his own savings and funds to support them so they could have a league with teammates who became lifelong friends.

He worked with multiple non-profits over the years to support the youth of American that fell into the "at risk" category to try and keep them on a path to self-support and to make them productive people in society. All of his charity, community service and volunteer work were given with no expectation of anything back.

He was also a volunteer at the Maricopa County Sheriff's Office as a volunteer deputy and lead trainer. His experience as a Maricopa County Superior Court officer was also on display as a problem solver and process server.

All of the kids he helped over the years are now graduating college, getting jobs, getting married, having kids of their own, and to some degree, he has played a part in their success. Some have even had the fortune to play professionally.

I know, personally, from being in a lawsuit with the State of Arizona with Mr. Sewall, that these types of cases can take on a life of their own. Mr. Sewall and I gathered information, upfront, from our attorneys, who were experts on how to run the business we were in, and we followed that guidance. An overzealous prosecutor twisted the information to make it into something very different than what happened, which the Attorney General finally realized. That required Mr. Sewall to go so far as to file a Chapter 13 Bankruptcy to stay the case as he had involuntary presidential recall orders in hand and had to deploy to Iraq. Even with those extraordinary circumstances, the prosecutor would not stay the case. Mr. Sewall was forced to file a BK action for no other reason but to be able to deploy and defend this country. It also protected me and gave us the time to gather the information so upon his return, almost a year later, it was dismissed. That took almost three years to get our final dismissal with prejudice by the Attorney General himself and a complete waste of taxpayer resources and our personal time, money, stress and destruction of our business.

In the case in your court, that expert was Mr. Stewart, who I know as well, and their counsel. Mr. Stewart can be very convincing and professes his great knowledge of the financial markets to convince most anyone he is an expert. I don't profess to know all the details of your case, but I know Mr. Sewall. I know how he thinks and how he operates as well as anyone from having played and coached football beside him as well as our business dealings over the years. If he was told everything was being done correctly from Mr. Stewart, as I was told by Mr. Stewart while at Mr. Sewall's wedding, I am sure he trusted and believed that. What I can also tell you is that breaking the law goes against everything I have seen from Mr. Sewall in over 30 years. Not only did he decide to wear a badge and protect his community, he did it for free as a volunteer. If that does not tell you the kind of person he is, I don't know what does.

Clearly, I was not a part of the trial or evidence but in looking at a person who gave his life to his country and sacrificed for everyone around him, to think that his wife and daughter will grow up with nothing and, more importantly, without father and husband seems a little inequitable considering all has already done for his country and the greater good of society.

I also know, from being a part of Mr. Stewart's Sonador Capital Management with Mr. Sewall that crashed in 2008, that Mr. Sewall has always worked towards "making everyone whole" and fixing the problems. He is at heart, a problem solver. That was one of his main focuses once his last project started having success. It wasn't to just enjoy the fruits of his work but as a priority to repair and make all of the parties who lost money whole again, including me and many of my friends and family who lost money with Sonador. Most business people just chalk it up to a bad experience and move on. Not Mr. Sewall. He took money from his own pocket to make sure an account was established to reimburse people for Mr. Stewart's Sonador losses from 8 years in the past for one simple reason. It was the

right thing to do and if Mr. Stewart was not going to do it, Mr. Sewall would, even though he lost a significant amount of his own money as we were investors in that failed venture.

I would ask that you show grace and some compassion for someone who's already completed 30+ years of volunteer work and community service up to this point. This process has already taken his income, employment and ability to make a living and repossessed all of his assets that they deemed "unlawfully" obtained through this case. How much is really left to take?

This case has already taken 4+ years to complete to this point which has really been a "sentence" in and of itself.

For the greater good of society, Mr. Sewall does not belong in a prison. If you want more community service and probation that would be ok as long as he can remain with his family. That's all he really cares about at this point and wasting the state's funds for a jail cell for him compared to the criminals we have walking the street seems a little off.

I've seen him wait for years when all his friends were getting married and having kids to finally meet the love of his life and then this happens. He never wanted anything more than a family and would have never risked that for a dollar.

I would humbly request that you consider this when making your ruling and take into consideration the amount of time and sacrifice that he has given his country and society during his life.

In my opinion, he doesn't belong in a prison. He belongs with his family.

Sincerely,



Michael Yamamoto
602-402-9999
Myamamoto34@gmail.com

Patrick Parham
1416 Nash Street
Garland, Texas 75042
pcp22usmc@gmail.com
October 24, 2024

To the Honorable Judge Moore,

I am writing to express my unwavering support for Bryant Sewall, who is facing charges of wire fraud. I believe it is essential to consider the entirety of his character and the significant contributions he has made to our community.

Throughout my time knowing Bryant, I have never felt, nor do I now feel, that he was acting in a manner that was unethical. His integrity has always been evident, especially during his distinguished career as a United States Marine Colonel, where he consistently demonstrated leadership and upheld the highest ethical standards.

Moreover, I ask that it be taken into consideration that Bryant could also be a victim in this unfortunate situation. The circumstances surrounding the case are complex, and it is important to recognize that he may have been misled or caught in a web of unfortunate events. His genuine character makes it hard to believe that he would intentionally engage in any wrongdoing.

In addition to his military service, Bryant has made significant contributions to our community, volunteering his time and resources to various local initiatives. Whether mentoring youth, participating in charity events, or supporting veterans' programs, he has consistently sought to uplift those around him. His positive influence has touched many lives and fostered a sense of hope and resilience in our community.

Bryant is also a devoted family man, responsible for the well-being and upbringing of his loved ones. The impact of his potential incarceration would not only affect him but also his family, who rely on his support and guidance. He has always prioritized their needs, and it is heartbreaking to think of the turmoil that a prison sentence would bring to them.

I urge you to consider these factors when making your decision. Bryant's contributions to our nation and community, combined with his commitment to family, demonstrate that he is a person of great value who deserves a chance for redemption rather than punishment.

Thank you for your time and consideration.

Sincerely,



Patrick Parham
pcp22usmc@gmail.com

RACHAEL COLLINS

4005 Moonlight Drive Little Elm . Texas 75068 | rachaelyoss@gmail.com

November 4, 2024

The Honorable William J. Martinez
United States District Judge
Re: Bryant E. Sewall

Dear Judge Martinez,

Please allow me to introduce myself. My name is Rachael Collins and I am Bryant's only niece. I was born when Bryant was 18 and on his way to college. My entire life I have seen him serve those around him. As a child it was in his service to our country as a United States Marine and later in life in his role as a devoted husband and father. The running joke in our family was that I would get married and have kids before him. That joke came true as I married in 2010 as Bryant was still in his military career. We were proud for him to be a part of our wedding in his full military uniform as he earned that right with his tireless and unwavering service.

It is a privilege to be a part of his family and witness the beautiful family that he and Hanna have built together. My kids, Catherine (age 11) and Jeffrey (age 6) love having their cousin Bella so close. We live 10 minutes from them as our entire immediate family lives in the small town of Little Elm.

Bella is a beautiful, thriving child who happens to be on the autism spectrum. Her success in life thus far is due to her parents unwavering support and teamwork on researching and providing her what she needs. Bryant has shown me my whole life what an upstanding, committed man looks like. First with his tireless commitment to the U.S. Marines, then as a devoted coach to his women's football team and most notably as a husband and father. He is most proud of the family he has built with Hanna and to have that taken from him after waiting so

long is heartbreaking. He has devoted decades of his life to serving his country and now he is dedicating his life to his family. Bella's success is not only due to her parents tireless work to find what's best for her but her parents ability to work as a team.

I appreciate you taking the time to read this message on behalf of Bryant Sewall. He has and will always be a man of integrity taking care of his family.

Respectfully,

A handwritten signature in blue ink that reads "Rachael Collins". The signature is written in a cursive, flowing style with a large initial "R" and a stylized "C".

Rachael Collins

Judge William J. Martinez

US District Judge, Colorado

November 1st, 2024

Dear Judge Martinez,

I write to you on behalf of Bryant Sewall. I have worked with Bryant in the roofing industry in Texas for the last several years and he is one of the most honest, hardworking and diligent people I have ever known. We worked for a Roofing contractor called FireFighter Roofing. I did much of the supplementing and insurance claim work and he was an installation supervisor. He learned quickly and is now an expert on the roof. However, in my dealings with the back office, I learned that the owner of the company had been committing insurance fraud by several methods and I informed the other employees. Bryant, along with myself and several others all immediately resigned and refused to work any place that would commit fraud. I have no doubt in my mind that Bryant would never be a part of ANY organization that he knew was committing fraud. Much like we did not know this company was doing so for several years, as it was hidden and we were all told everything was being done correctly and yet, it was not. His reaction was visceral and his action immediate and he never stepped foot in the door again.

At that time, Bryant decided to take his new knowledge and expertise and began to work as an insurance inspector as well as help me form my own company. Bryant's ideas were innovative and creative, and I used many of those ideas in my new company. Bryant was adamant that he could use what he now knows to help protect people from other dishonest roofing contractors. Here in Texas, there is no licensing for roofing contractors and it is filled with people that want to take advantage of homeowners to increase their profits and often do. Bryant identified that from working at FireFighter and knew that he could expose these things to homeowners, and he does so every day he is at work. He saves 3 to 5 people a day from being defrauded or taken advantage of by roofing contractors. He thrives in this environment and loves being able to help people. I noticed that in our first meeting his ideas were always about what can be done to further help the homeowner and enhance their home. His ethics and moral compass are beyond reproach, and I have noticed that from the very first days working with him.

I served in the 82nd Airborne Division during the Grenada conflict so I know a little something about honesty and integrity. You will find no other man, who is more dedicated to honesty and ready to help his fellow man, than Bryant. Although I have not known him as long as other people you will no doubt get letters from, I am sure I see the same traits that they have. Impeccable honesty and integrity. A deep sense of service to others and that good is in all men. His loyalty and devotion to duty and to work and most of all to his family.

I have no doubt in my mind, that he would never knowingly defraud another person. I would trust him with my money, my family and my life. There are not a lot of people on that list. Bryant is absolutely one of a very few I would trust at that level. I don't know the facts of this case but I know

fraud is as against his DNA as anything could be. I have seen him climb a steep roof to do something for elderly or compromised individuals and put his own health in danger to do something they needed done. Not because he would be rewarded in any way but simply because it was the right thing to do. He always wants to find a way to help others. His kindness to those in need and his desire to do the right thing is ever present.

I know his career in the Marine Corps was extensive and impressive. He has built his whole life around the corps values that the Marine Corps teaches and he taught to his Marines, Honor, courage and commitment. I know Bryant would never do anything dishonest because he lives to be a Marine. He would never do anything to soil the uniform he wore for over 3 decades. Being a member of an elite until myself, I understand this concept much better than most. It would be a betrayal of the highest level to soil the uniform you worked your whole life to obtain. His courage is always on display as he is fearless on the roof. Always careful but he does things that most people don't even try in order to do the very best job possible for the customer. His commitment is an ingrained part of this conscience. If he does not know how something works, he seeks out the resident expert and then follows that advice exactly.

No matter the circumstances, there is no scenario I can even imagine that would have Bryant deserving to be in prison. That would be a tremendous loss to our society and to his family. If Bryant made mistakes, like we all do in life, I am absolutely sure he has never made the same one twice. Bryant is very smart, but no one can be an expert in everything and if the information he was given was bad, or inaccurate, it could lead him down the wrong path as we have all experienced in life. He would never make this mistake again and there is nothing on this earth he cherishes more than his wife and daughter. They are the very air that he breathes. No matter what the scenario is, he would never, EVER put his family at risk or in peril. He would sooner die himself than ever do anything to jeopardize them or their future. He adores them in a way that you can tell is very special. To make his wife a widow and his daughter an orphan with a long sentence simply does nothing but further harms our society and with zero prospect for a repeat offense, he should be given a second chance. After 30 years of service to our country, he deserves a second chance. Deterrence is not an issue as Bryant would never repeat any of the actions that have led to this point. No loss is so great that it should take the life of someone who gave 30 years of service to his country, and he has performed flawlessly his entire life. I don't know the situation in which someone dedicates their life to serving others and putting their lives on the line, then retires, gets married and has a child they have wanted their entire life and then transitions to a criminal. Every action I have seen, heard of or witnessed from Bryant is the exact opposite of what he is charged with. I am sure there is another answer, and I fear that he was misled in much the same way that it is alleged he misled others. If he was misled himself and told things that were not accurate and he simply repeated those things, thinking they were true, I don't know how that can be held against him. I know you have it within your power to use your discretion in that case and I pray that you will do so.

Bryant has much more good to do in this world. Sending a man with such an incredible history, accomplishments and service to prison is such a waste and simply not the right thing to do. I have seen his life firsthand and the devastating impact this has had on him, his family and his health. He works hours and does things that many half his age cannot do in order to take care of his family. They are his sole motivation. If there is any human being that has put in the years of service and

deserves compassion and a second chance, it is Bryant Sewall. I know full well the months and years spent in far away places serving your country and all Bryant has sacrificed for this country. I know he married late in life because he served his country first. That service is something less than 1% of the people in our country give. Bryant is one of a very, very few that did so, for decades and at the highest level you can perform. All of that should more than offset the need for punishment in this case. The process in itself is punishment and I know from him this case has been going on for years.

I know your honor has to take in all sides of this case and consider everything that has happened. Bryant is as good and honest of a man as I have met in my life. If there is ANY chance, no matter how small that this hero and patriot who has given so much to this country, had a smaller role than others or was misled by those people and put into this situation then I beseech your honor to show leniency and hand down the shortest sentence possible. I know Bryant would continue to do the good he is doing in the roofing industry and would continue to deliver people from insurance fraud as he does each day. Don't compound one wrong with another and destroy a life and the lives of his family when he has given so much to this country. To protect your freedom and mine and the rest of the nation and other nations. I know he has done so much good in this world. Saved thousands of lives, mentored many kids and done so much to protect and serve our communities. I don't know if you have ever had a man of this caliber and service history in your court before but his service is extraordinary and if anyone, ever deserved a second chance, it would be Bryant Sewall.

Respectfully submitted.

Wes Rogers

Founder, SSR Roofing

**UNITED STATES MARINE CORPS**

4TH AIR NAVAL GUNFIRE LIAISON COMPANY
MARINE FORCES RESERVE
NAVAL AND MARINE CORPS RESERVE CENTER
1226 MARINE DRIVE
WEST PALM BEACH, FLORIDA 33409-6298

IN REPLY REFER TO:

1400
GAS
11 Jan 07

From: Colonel (sel) Gregory Studds, USMCR
To: President, FY 2008 Reserve Lieutenant Colonel Selection Board
Via: Major Bryant Sewall, USMCR

Subj: LETTER OF RECOMMENDATION FOR FY 2008 RESERVE LIEUTENANT
COLONEL SELECTION BOARD, CASE OF MAJOR BRYANT SEWALL
454-57-2375 / 0802

1. This letter is forwarded to the FY2008 Reserve Lieutenant Colonel Selection Board for consideration in the promotion of Major Bryant Sewall. I am Major Sewall's Commanding Officer at 4th ANGLICO in West Palm Beach, Florida. I felt that due to Major Sewall's superb qualifications and the importance to the Marine Corps of his continued service that it was appropriate to briefly expound beyond the comments I wrote in his recent, outstanding fitness report.
2. Major Sewall came to the unit exceptionally well qualified. He was one of only a handful of officers that possessed extensive fire support experience, was proficient at parachute operations, and had previously served in combat with an ANGLICO unit. As the company Operations Officer, Bryant coupled his unique talents and knowledge with his abundant initiative and dedication to provide realistic, exciting training for the Marines and Sailors of the command. This training was based on his years of ANGLICO experience and the lessons learned from 4th ANGLICO's two years of deploying detachments to the Central South of Iraq in support of the Multinational Division. He developed and then implemented an efficient and executable multi-year training plan aimed at refocusing the company down to the lowest levels on the basics of fire support planning and execution, communications, weapons employment, and other basic ANGLICO skills. His no-nonsense professionalism and confidence inspiring demeanor set the tone for how the dangerous and challenging parachute training and operations were conducted. I was never concerned about the safety or relevance of the training while he was my Operations Officer.
3. Major Sewall currently serves as the Executive Officer and is one of the finest in this position that I have ever served with. His unique blend of genial personality, strong work effort, profuse energy, superb communications skills, poise, and personal integrity make him the perfect officer for the job. Because of his professional expertise, operational ability, ANGLICO experience, and leadership skills Bryant holds the XO billet even though there is another Lieutenant Colonel, besides myself, in the command. It speaks volumes about his value to the Marine Corps that he is a trusted advisor to me and the senior officer agrees that Bryant is the right man for the job and feels comfortable in seeking his guidance and advice on ANGLICO issues.
4. Major Sewall is a highly talented, resourceful, and proficient field grade officer. He possesses what, in my opinion, is the essence of a superior Marine Officer and what the Corps desires in a

reserve Lieutenant Colonel. It is not his vast experience, his truly superb past performance, nor his confidence-inspiring leadership that make him worthy of promotion, rather it is the infinite potential he exhibits at every challenge he faces that makes Bryant a must for promotion and future command. Based on my observations during the time we have served together, I would seek out this superb officer to serve with me again, especially in combat, and I enthusiastically recommend this officer for promotion.



G.A. STUDDS



**DEPARTMENT OF THE AIR FORCE
AIR UNIVERSITY (AETC)**

SEP 25 2013

Colonel David L. Cool
Associate Dean, Air War College Distance Learning
325 Chennault Circle
Maxwell AFB AL 36112-6427

Lieutenant Colonel Bryant E. Sewall
2096 East Catclaw Street
Gilbert AZ 85296

Dear Colonel Sewall

Congratulations on completing the Air War College Distance Learning Program with an overall grade of "Outstanding." Fewer than one percent of our Distance Learning Program graduates earn this distinction. Your diploma is attached; I hope you will display it proudly and prominently.

The Air War College Distance Learning Program is challenging, and I realize it required much dedication and a significant investment of your personal time to complete the program. It is my hope that you will find it to be of great benefit as you progress in your career. Let me also take this opportunity to remind you that this is only the beginning of your development as a senior officer. To further advance as a strategic leader, the Air War College makes a variety of materials available to all its graduates on the Air War College website; I encourage you to visit it often.

You have completed a significant milestone in your professional development, and I am very pleased with your performance in this course. Your "Outstanding" is a particularly significant achievement. Thank you for your personal commitment to excellence and for your determination to better yourself as you serve our great Nation.

Sincerely

A handwritten signature in black ink that reads "David L. Cool".

DAVID L. COOL
Colonel, USAF

Attachment:
Diploma

1400
10 Sep 2014

From: MajGen Richard L. Simcock, USMC
To: President, FY16 Reserve Colonel Promotion Board

Subj: PREMIER CASE REF LTCOL BRYANT E SEWALL/454 57 2375/0802/USMCR

Ref: (a) MarAdmin 173/14
(b) MarCorProMann, Vol 1. Off Prom 3006

Encl: (1) Email from Maj Toby Merrill ref CSCDEP funded program
(2) Letter from Associate Dean, USAF Air War College
(3) Air War College Transcript
(4) Letter of Recommendation Col. Michael Morris USMC
(5) Letter of Recommendation Col. (Sel) Gregory Studds USMCR

1. IAW Ref (b), I enthusiastically recommend that Lieutenant Colonel Sewall be granted Premier Case Status for the FY16 Reserve Colonel Promotion Board. I believe that his inability to enroll in the CSCDEP funded program and subsequent PME delinquency along with the delay in receiving official documentation of his USAF Air War College completion warrants such status. Enclosures (1) through (5) are provided as supporting documentation for the board's consideration.

2. As a Major, LtCol Sewall was either deployed (3rd Anglico) or in key leadership positions (4th Anglico) of deploying units or combat detachments (Encl 4 and 5). Upon promotion to LtCol, he immediately applied for the CSCDEP funded program to correct his PME delinquency and was denied based upon a Reserve Affairs policy. He subsequently applied, and was denied, in '08, '09, '10 and 2011 (Encl 1). In 2012 this policy was changed and LtCol Sewall was selected as a funded student in CSCDEP and graduated in May 2014. Realizing this graduation date would be after he was in zone for promotion, he requested to take both years concurrently was denied by CSCDEP due to the sequential nature of the curriculum. This delay in his ability to complete CSCDEP, left LtCol Sewall ineligible to apply for Command as a LtCol and incomplete in PME for both years he was in zone for Promotion to Col.

3. During the scheduled pause between academic year one and year two of CSCDEP and while still a member of the MARFORPAC IMA Det supporting several US/ROK exercises, LtCol Sewall enrolled in and completed USAF Air War College. He graduated in September 2013 with distinction with an overall grade of Outstanding, placing him in the top 1% of all Air War College distance students (Encl. 2). While he was "War College complete" prior to the FY15 Reserve Colonel Selection board, sequestration furloughs delayed his completion information and diploma which is required for official entry of completion into his OMPF and MBS and he again was showing no PME completion.

4. I request the board grant LtCol Sewall Premier case status and the opportunity to be presented with the complete and accurate PME record that he has earned and to strongly consider his overall record of accomplishment.

RICHARD L. SIMCOCK
MAJGEN USMC

**UNITED STATES MARINES CORPS**

COMMAND ELEMENT
2D MARINE EXPEDITIONARY BRIGADE
PSC BOX 20080
CAMP LEJEUNE, NORTH CAROLINA 28542-0080

IN REPLY REFER TO:
1400
RLSII
10 Sep 14

From: Commanding General, 2d Marine Expeditionary Brigade
To: President, FY16 Reserve Colonel Promotion Board

Subj: PREMIER CASE STATUS IN CASE OF LTCOL BRYANT E SEWALL 0802
USMCR

1. I request the board grant LtCol Sewall Premier Case Status and the opportunity to be presented with the complete and exemplary PME record that he has earned as part of his overall record of accomplishment.

A handwritten signature in black ink, appearing to read "R. L. Simcock II".

R. L. SIMCOCK II

7 of 14
UNITED STATES MARINE CORPS

COMMANDING OFFICER

3D ANGLICO

MARINE FORCE RESERVE, FMF, USMCR

NAVAL AND MARINE CORPS RESERVE CENTER

801 REEVES AVENUE

TERMINAL ISLAND, CA 90731-5992

10 JAN 04

From: Commanding Officer, 3d Anglico

To: Major Bryant E. Sewall, 454572375

Subj: AWARD OF THE MILITARY OUTSTANDING VOLUNTEER SERVICE MEDAL

Ref: (a) SECNAVINST 1650.1G

1. In accordance with reference (a), Major Bryant Sewall is authorized to wear the Military Outstanding Volunteer Service Medal for outstanding public and community service with Every Kid Counts, Inc Children's Charity for the period of January 1998 to December 2003.
2. Major Sewall's continuing efforts as a sponsor, volunteer, mentor and member of the board of directors of this growing children's charity, have been an instrumental part of the programs Every Kid Counts has brought to the underprivileged children of Arizona. Major Sewall's efforts and contributions are directly responsible for putting hundreds of toys each year in the hands of homeless children who otherwise would have no holiday gifts.
3. Major Sewall's sponsorship and participation in community athletic projects to provide sports equipment to schools for homeless children, has resulted in many children being given the opportunity to play both baseball and soccer for the first time. Promoting the values of teamwork, sportsmanship and fair play both on and off the athletic field.
4. As a member of the mentoring program, Major Sewall joins the ranks of professional athletes and local politicians, donating his time to speak to children's groups on the hazards of drug use and other harmful lifestyles prevalent in today's society. In many cases these children not only include the homeless, but orphans and transient foster children with no established adult guidance.
5. Major Sewall's contributions to the youth of his community have greatly enhanced the quality of life for many homeless and underprivileged children and represented the community service values of the United States Marine Corps. Major Sewall efforts reflect great credit upon himself and provide a continuing positive linkage between the community and United States Marine Corps.

A handwritten signature in black ink, appearing to read "R. J. Senini".

R. J. SENINI

8 of 14
UNITED STATES MARINE CORPS

COMMANDING OFFICER
3D ANGLICO
MARINE FORCE RESERVE, FMF, USMCR
NAVAL AND MARINE CORPS RESERVE CENTER
801 REEVES AVENUE
TERMINAL ISLAND, CA 90731-5992

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A handwritten signature in black ink, appearing to read "R. J. Senini".

R. J. SENINI



Marine Corps Recruiting Command

takes pleasure in presenting this diploma to

LtCol Bryant Sewall

Certifying that this Commissioned Officer has met all the requirements
and has successfully completed the curriculum prescribed for

Recruiter Management Course

RMC 3-08

20080811 - 20080822

Given at the National Conference Center
Lansdowne VA.

A handwritten signature in black ink, appearing to be "ME", written over a circular stamp.

MGySgt Mark Erhart
National Training Team Chief

A handwritten signature in black ink, appearing to be "K. Mayfield", written over a circular stamp.

CWO 5 Karl Mayfield
National Training Team Officer



DEPARTMENT OF THE NAVY
THIS IS TO CERTIFY THAT
THE SECRETARY OF THE NAVY HAS AWARDED THE
NAVY AND MARINE CORPS ACHIEVEMENT MEDAL

TO


MAJOR BRYANT E. SEWALL, UNITED STATES MARINE CORPS RESERVE

FOR

PROFESSIONAL ACHIEVEMENT IN THE SUPERIOR PERFORMANCE OF DUTIES WHILE SERVING AS THE 3RD BRIGADE COMMANDER, 3D ANGLICO, I MARINE EXPEDITIONARY FORCE FROM JANUARY 2003 TO APRIL 2003. MAJOR SEWALL SINGLE HANDEDLY ADAPTED THE NEW TARGETING AND COMMAND AND CONTROL SOFTWARE SYSTEMS INTO THE COMPANY'S HARDWARE ASSETS FOR EMPLOYMENT IN SUPPORT OF OPERATION IRAQI FREEDOM. MAJOR SEWALL'S IN DEPTH KNOWLEDGE OF THE INFORMATION SYSTEMS AND QUICK ABSORPTION OF THE USES OF THE NEW SOFTWARE WERE MAJOR CONTRIBUTORS TO THE OVERWHELMING SUCCESS OF THE MISSION AND THE BRITISH ARMY'S 7TH ARMOURED BRIGADE. MAJOR SEWALL'S ACTIONS REFLECTED CREDIT UPON HIMSELF AND WERE IN KEEPING WITH THE HIGHEST TRADITIONS OF THE MARINE CORPS AND THE UNITED STATES NAVAL SERVICE.

GIVEN THIS 30th DAY OF SEPTEMBER 2003




SECRETARY OF THE NAVY
D. L. NEELY, LTCOL, USMC
COMMANDING

1400
1 Sep 2014

From: Colonel Thomas M. Quoss, USMCR
To: President, FY16 Reserve Colonel Promotion Board

Subj: PREMIER CASE REF LTCOL BRYANT E SEWALL/454 57 2375/0802/USMCR

Ref: (a) MarAdmin 173/14
(b) MarCorProMann, Vol 1. Off Prom 3006

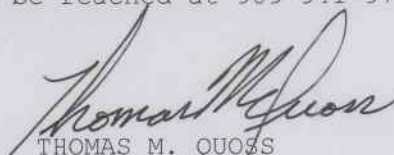
Encl: (1) Email from Maj Toby Merrill ref CSCDEP funded program
(2) Letter from Associate Dean, USAF Air War College
(3) Air War College Transcript
(4) Letter of Recommendation from Col. Michael Morris

1. IAW Ref (b), I enthusiastically recommend that Lieutenant Colonel Sewall be granted Premier Case Status for the FY16 Reserve Colonel Promotion Board. I believe that his initial inability to enroll in, and subsequent delinquency in receiving documentation of his PME completion warrants such status. Enclosures (1) through (4) are provided as supporting documentation for the board's consideration.

2. As a Major, LtCol Sewall was either deployed or in leadership positions (OpsO/XO) of deploying units or combat detachments. Upon promotion to LtCol he immediately applied for the CSCDEP funded program and was denied based upon a Reserve Affairs policy. He subsequently applied, and was denied, in '08, '09, '10 and 2011 (Encl 1). In 2012 the policy was changed and LtCol Sewall was allowed to participate in the curriculum and graduated in May 2014. His request to take both years concurrently was denied by CSCDEP due to the sequential nature of the curriculum. This delay in his ability to complete CSCDEP in a timely manner, left LtCol Sewall incomplete in PME for both years he was in zone for Promotion to Col and ineligible to apply for Command as a LtCol.

3. To his credit, LtCol Sewall enrolled and completed USAF Air War College while enrolled in the CSCDEP. He graduated in September 2013 with distinction with an overall grade of Outstanding, placing him in the top 1% of all Air War College distance students (Encl. 2). While he was "War College complete" prior to FY15 Reserve Colonel selection board, sequestration delayed his completion information and he again was showing no PME completion on his MBS.

4. I urge the board to provide LtCol Sewall the opportunity to be presented to compete with the complete, and accurate, PME record that he has earned. I believe that this can be accomplished by granting him Premier Case Status. I can be reached at 989-941-9770 or at tquoss@aol.com.


THOMAS M. QUOSS
COLONEL USMCR



UNITED STATES MARINE CORPS
COMMAND AND STAFF COLLEGE
MARINE CORPS UNIVERSITY
2076 SOUTH STREET
QUANTICO, VIRGINIA 22134-5068

IN REPLY REFER TO:
1400
MFM
03 Jan 07

From: Colonel Michael F. Morris, USMC
To: President, FY 2008 Reserve Lieutenant Colonel Selection Board
Via: Major Bryant Sewall, USMCR

Subj: LETTER OF RECOMMENDATION FOR FY 2008 RESERVE LIEUTENANT
COLONEL SELECTION BOARD, CASE OF MAJOR BRYANT SEWALL
454-57-2375 / 0802

1. This letter is forwarded to the FY2008 Reserve Lieutenant Colonel Selection Board for consideration in the promotion of Major Bryant Sewall. I was Major Sewall's Inspector-Instructor at 3d ANGLICO in Long Beach, California from July 2002 to July 2004. During this intense operational period, during which the unit deployed to Iraq in support of OIF I, I gained a strong appreciation for the capabilities of this talented officer.
2. Major Sewall served as one of 3d ANGLICO's three Brigade Platoon Commanders. At the time the company was very senior – all of the top six leadership positions, except his, were filled by Lieutenant Colonels and there were many other Majors in the command. As a platoon leader, Major Sewall capably commanded 50 Marines, including eight officers. Three of those officers were also Majors; one was a Navy commander serving as a NGLO and another was a Vietnam veteran and the most senior CWO5 in the Corps. The fact that such experienced officers felt comfortable working for Major Sewall, and in the latter two cases specifically requested to serve under him, underscores the kind of confidence-inspiring leader he is.
3. Major Sewall was an especially effective trainer. Jump qualified, he developed and maintained the most proficient airborne platoon in the company. More importantly, he also possessed the most extensive fire support experience among our Brigade Platoon Commanders. This expertise enabled him to train his unit to a high standard of technical and tactical proficiency. During the workup for the OIF I deployment, however, his biggest contribution was in the embarkation field. He led a "tiger team" that updated previous embarkation plans for the company's vehicles and equipment. Tested and proven in a successful pre-war Mobilization Operational Readiness Deployment Test, Major Sewall's embarkation plan enabled 3d ANGLICO to deploy to Kuwait in January 2003 before its scheduled time because the company was ready when some active duty units were not.
4. During the war, 3d ANGLICO supported 1st (UK) Armoured Division. Unique task organization considerations led the company to field two reinforced Brigade Platoons in support of 16th Air Assault Brigade and 7th Armoured Brigade. Because he was the junior platoon commander, Major Sewall's platoon was divided to reinforce the other two. He was assigned to

the platoon supporting the Division's main effort, 7th Armoured Brigade. In the weeks leading up to the attack, Major Sewall served as the primary POC between 3d ANGLICO and the I MEF Force Fires cell. He directed training and implementation programs that fielded C2PC with blue force tracker and the ADOCS fire support system with its required imagery (a critical link that provided the fires interface between the British division and I MEF). From my position as a planner on the MEF staff at Camp Commando, it was clear that Major Sewall's personal efforts, especially his persistence and technical expertise in working through a variety of technological challenges with other MEF fires experts, enabled 3d ANGLICO to provide mission critical fire support to our British allies in the fighting that soon followed.

5. During the battles for Basra, Major Sewall served as the Fire Support Coordinator in the armoured brigade's operations center. He scheduled aircraft, cleared fire missions, planned targeting for SAS missions, and coordinated and controlled several high payoff strikes on Baath party headquarters, meeting sites, and leadership targets. One such strike targeted the infamous Chemical Ali. Suitable JDAM ordnance was not available, so Major Sewall used ADOCS imagery to talk the aircraft onto the target identified by SAS sources. While Ali was not killed, the misidentified body of one of his bodyguards convinced the local populace that this menace had been removed. This incident sparked a groundswell of support for the coalition and a few days later Basra fell. The CG, 7th Armoured Brigade, called Major Sewall's missions the critical points in the siege that subsequently triggered a relatively blood-free seizure of the city. In the post-conflict environment, Major Sewall acted as the Al Medina city manager. He identified critical infrastructure requirements for sanitation, water, and electrical shortfalls and assessed more than 70 damaged Iraqi schools so that British civil affairs teams could focus their plans to alleviate the needs of the local citizenry. In both the combat and SASO phases of the conflict, Major Sewall exemplified the attributes of a strong leader: he sought responsibility, acted decisively, and contributed in a variety of both highly visible and more subtle ways to the success of his unit.

6. Major Sewall is a versatile, effective, and experienced field grade officer. He exhibits an effective blend of technical skill, poise under pressure and strong communication skills. He possesses a gracious personality, but one that is complemented by a drive and discipline that ensures subordinates accomplish their tasks on time and to standard. His deep sense of personal responsibility, strong work ethic, and abundant initiative indicate enormous potential for future service. Based on his performance at 3d ANGLICO, I believe he has the professional expertise, operational savvy, and leadership skills to serve effectively as a Lieutenant Colonel of Marines and beyond. I would welcome the opportunity to serve alongside him again in either peace or war and enthusiastically recommend this officer for promotion.


M.F. MORRIS

From: Lieutenant Colonel Peter W Ahern, USMC
To: President, FY 2008 Reserve Lieutenant Colonel Selection Board
Via: Major Bryant Sewall, USMCR

Subj: LETTER OF RECOMMENDATION FOR FY 2008 RESERVE LIEUTENANT COLONEL SELECTION BOARD, CASE OF MAJOR BRYANT SEWALL
454-57-2375 / 0802

1. This letter is forwarded to the FY2008 Reserve Lieutenant Colonel Selection Board for consideration in the promotion of Major Bryant Sewall. I was Major Sewall's Inspector-Instructor at 4th ANGLICO in West Palm Beach, Florida from October 2005 to July 2006. I observed a very capable and insightful Marine Officer. 4th ANGLICO was in the final months of a multiple year commitment to Iraq and it was Major Sewall's job to reintegrate returning Marines into a company training program and prepare for future operations. He performed all assigned tasks in a superior manner.

2. During my time with 4th ANGLICO, Major Sewall served as the company Operations Officer and was a trusted advisor. Major Sewall was an especially effective trainer and developed an efficient and executable two year training plan that became the template for restoring a company level focus to a unit that was completing a series of deployments (by detachment) to Operation Iraqi Freedom II. Bryant was savvy in capturing the lessons learned from 4th ANGLICO's two year operation supporting a Polish led multi-national division in Iraq and building off the experiences and lessons. 4th ANGLICO is a parachute capable unit and Bryant is a very talented jumper. In addition to his own personal expertise he invested much time and effort in enhancing the capability and safety of 4th ANGLICO. During his time as Operations Officer while under my observation, 4th ANGLICO conducted multiple successful parachute operations without injury or incident. I always was confident that complex and dangerous operations were in good hands when Bryant was involved.

3. During our time together, 4th ANGLICO was relatively short on senior officers and Bryant became a trusted advisor to both the Company Commander and myself and many of the junior officers felt comfortable in seeking his guidance. Challenging times bring out the true character of men and I was impressed with the mettle of Bryant Sewall.

4. Major Sewall is a competent and experienced field grade officer. I believe he is the type of officer we want and desire as a Lieutenant Colonel in the Marine Corps Reserve. He has boundless future and command potential. We will make a mistake if we do not promote him on this board. Based on his performance at 4th ANGLICO, I would not hesitate to serve alongside him again in any future circumstance and enthusiastically recommend this officer for promotion.

P.W. AHERN
LT COL USMC

John Tracer 4/7/92 | Donald Darric - 7-92 QCTH

CAUTION: NOT TO BE USED FOR IDENTIFICATION PURPOSES THIS IS AN IMPORTANT RECORD SAFEGUARD IT. ANY ALTERATIONS IN SHADED AREAS RENDER FORM VOID

CERTIFICATE OF RELEASE OR DISCHARGE FROM ACTIVE DUTY

1. NAME (Last, First, Middle) SEWALL Bryant Edwin		2. DEPARTMENT, COMPONENT AND BRANCH USMC-C1		3. SOCIAL SECURITY NO. 454 57 2375	
4.a. GRADE, RATE OR RANK 1stLt		4.b. PAY GRADE O-2		5. DATE OF BIRTH (YYMMDD) 660818	
6. RESERVE OBLIG. TERM. DATE Year 94 Month 01 Day 23		7.a. PLACE OF ENTRY INTO ACTIVE DUTY OSS Arlington, TX			
7.b. HOME OF RECORD AT TIME OF ENTRY (City and state, or complete address if known) Leonard, TX				8.a. STATION WHERE SEPARATED 3dBn 11thMar 1stMarDiv (RUC 11330)	
8.b. LAST DUTY ASSIGNMENT AND MAJOR COMMAND 3dBn 11thMar 1stMarDiv 29 Palms CA				9. COMMAND TO WHICH TRANSFERRED Marine Corps Reserve Support Center Overland Park, Kansas (RUC 36005)	
10. SGLI COVERAGE None Amount: \$ 100,000		11. PRIMARY SPECIALTY (List number, title and years and months in specialty. List additional specialty numbers and titles involving periods of one or more years.) 0802 - Field Artillery Officer (1 Year 10 Months)			
12. RECORD OF SERVICE		Year(s)		Month(s)	
a. Date Entered AD This Period		88		08	
b. Separation Date This Period		92		03	
c. Net Active Service This Period		03		06	
d. Total Prior Active Service		00		00	
e. Total Prior Inactive Service		02		06	
f. Foreign Service		00		07	
g. Sea Service		00		08	
h. Effective Date of Pay Grade		90		08	
13. DECORATIONS, MEDALS, BADGES, CITATIONS AND CAMPAIGN REBONS AWARDED OR AUTHORIZED (All periods of service) Combat Action Ribbon; Southwest Asia Service Medal (w/ 2 Stars) National Defense Service Medal; Sea Service Deployment Ribbon Rifle Expert Badge; Pistol Expert Badge (2nd Award)					
14. MILITARY EDUCATION (Course title, number of weeks, and month and year completed) Officer Candidate School Jr/Br Course (12 - 07/86) Officer Basic Course (23 - 11/89) Mountain Warfare Training Summer Course (04 - 08/90)					
15.a. MEMBER CONTRIBUTED TO POST-VETERAN ERA VETERANS' EDUCATIONAL ASSISTANCE PROGRAM		Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>		15.b. HIGH SCHOOL GRADUATE OR EQUIVALENT	
				Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	
16. DAYS ACCUMULATED LEAVE PAID				RUB 9.0 SLB 0.0	
17. MEMBER WAS PROVIDED COMPLETE DENTAL EXAMINATION AND ALL APPROPRIATE DENTAL SERVICES AND TREATMENT WITHIN 90 DAYS PRIOR TO SEPARATION <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No					
18. REMARKS None					
19.a. MAILING ADDRESS AFTER SEPARATION (Include ZIP Code) 833 Rushmore Plano, TX 75023			19.b. NEAREST RELATIVE (Name and address - include Zip Code) William B. Sewall (Father) COMM ADDRESS		
20. MEMBER REQUESTS COPY 4 BE SENT TO			21. OFFICIAL AUTHORIZED TO SIGN (Typed name, grade, title and signature) J. B. LAIRD, GySgt, BnPersChf		
22. MEMBER REQUESTS COPY 4			Initials BSL		
SPECIAL ADDITIONAL INFORMATION (For use by authorized agencies only)					
23. TYPE OF SEPARATION Released from active duty			24. CHARACTER OF SERVICE (Include upgrades) HONORABLE		
25. SEPARATION AUTHORITY MCO P1900.16D par. 1005			26. SEPARATION CODE MBK3		27. REENTRY CODE N/A
28. NARRATIVE REASON FOR SEPARATION Completion of required service (Expiration of active obligated service USMCR)					
29. DATES OF TIME LOST UNDER THIS PROGRAM None				30. MEMBER REQUESTS COPY 4	

CAUTION: NOT TO BE USED FOR
IDENTIFICATION PURPOSESTHIS IS AN IMPORTANT RECORD.
SAFEGUARD IT.ANY ALTERATIONS IN SHADED AREAS
RENDER FORM VOID**CERTIFICATE OF RELEASE OR DISCHARGE FROM ACTIVE DUTY**

This Report Contains Information Subject to the Privacy Act of 1974, As Amended.

1. NAME (Last, First, Middle) SEWALL, BRYANT E.		2. DEPARTMENT, COMPONENT AND BRANCH USMCR-KM		3. SOCIAL SECURITY NUMBER 454 57 2375	
4a. GRADE, RATE OR RANK LTCOL	b. PAY GRADE O5	5. DATE OF BIRTH (YYYYMMDD) 19660818	6. RESERVE OBLIGATION TERMINATION DATE (YYYYMMDD) 00000000		
7a. PLACE OF ENTRY INTO ACTIVE DUTY PLANO, TX 75025		b. HOME OF RECORD AT TIME OF ENTRY (City and state, or complete address if known) TX			
8a. LAST DUTY ASSIGNMENT AND MAJOR COMMAND COMMARFOREUR, STUTTGART, GERMANY			b. STATION WHERE SEPARATED EUROPEAN PAC (46150)		
9. COMMAND TO WHICH TRANSFERRED N/A				10. SGLI COVERAGE <input type="checkbox"/> NONE AMOUNT: \$ 400,000	
11. PRIMARY SPECIALTY (List number, title and years and months in specialty. List additional specialty numbers and titles involving periods of one or more years.) 0802, FIELD ARTILLERY OFFICER, 00 YEARS, 11 MONTHS		12. RECORD OF SERVICE		YEAR(S)	MONTH(S)
		a. DATE ENTERED AD THIS PERIOD		2014	10
		b. SEPARATION DATE THIS PERIOD		2015	09
		c. NET ACTIVE SERVICE THIS PERIOD		00	11
		d. TOTAL PRIOR ACTIVE SERVICE		05	02
		e. TOTAL PRIOR INACTIVE SERVICE		23	07
		f. FOREIGN SERVICE		02	03
		g. SEA SERVICE		00	00
		h. INITIAL ENTRY TRAINING		00	00
		i. EFFECTIVE DATE OF PAY GRADE		2007	05
13. DECORATIONS, MEDALS, BADGES, CITATIONS AND CAMPAIGN RIBBONS AWARDED OR AUTHORIZED (All periods of service) NAVY AND MARINE CORPS ACHIEVEMENT MEDAL, COMBAT ACTION RIBBON (OEF/OIF IRAQ), COMBAT ACTION RIBBON (DESERT STORM), PRESIDENTIAL UNIT CITATION-NAVY, NAVY UNIT COMMENDATION (2), NAVY MERITORIOUS UNIT COMMENDATION, SELECTED MARINE CORPS RESERVE MEDAL (4), NATIONAL DEFENSE SERVICE MEDAL (2), SOUTHWEST ASIA SERVICE MEDAL (4), GLOBAL WAR ON TERRORISM EXPEDITIONARY MEDAL (OIF IRAQ), GLOBAL WAR. SEE REMARKS.		14. MILITARY EDUCATION (Course title, number of weeks, and month and year completed) NONE			
15a. COMMISSIONED THROUGH SERVICE ACADEMY					
b. COMMISSIONED THROUGH ROTC SCHOLARSHIP (10 USC Sec. 2107b)				YES	x NO
c. ENLISTED UNDER LOAN REPAYMENT PROGRAM (10 USC Chap. 109) (If yes, years of commitment: _____)				YES	x NO
16. DAYS ACCRUED LEAVE PAID 28.5	17. MEMBER WAS PROVIDED COMPLETE DENTAL EXAMINATION AND ALL APPROPRIATE DENTAL SERVICES AND TREATMENT WITHIN 90 DAYS PRIOR TO SEPARATION				
	YES				NO
18. REMARKS SERIAL # 4362194 /EDIPI: 1127999925. ITEM NO. 13 CONT. ON TERRORISM SERVICE MEDAL, KOREAN DEFENSE SERVICE MEDAL, MILITARY OUTSTANDING VOLUNTEER SERVICE MEDAL, SEA SERVICE DEPLOYMENT RIBBON (3), ARMED FORCES RESERVE MEDAL (W/BRONZE HOUR GLASS), ARMED FORCES RESERVE MEDAL (W/M DEVICE), ARMED FORCES RESERVE MEDAL (W/SILVER HOUR GLASS), KUWAIT LIBERATION MEDAL (SAUDI ARABIA), KUWAIT LIBERATION MEDAL (KUWAIT), CERTIFICATE OF APPRECIATION, LETTER OF APPRECIATION, SHARPSHOOTER PISTOL QUALIFICATION BADGE, NAVY/MARINE CORPS PARACHUTIST INSIGNIA. MEMBER PARTICIPATED IN OEF/OIF, IRAQ, 20030114-20030623. MEMBER PARTICIPATED IN OPERATION INHERENT RESOLVE, , 20030114-20030120. MEMBER PARTICIPATED IN OPERATION INHERENT RESOLVE, , 20030114-20030119. MEMBER. CONTINUED ON CONTINUATION SHEET. The information contained here in is subject to computer matching within the Department of Defense or with any other affected Federal or non-Federal agency for verification purposes and to determine eligibility for, and/or continued compliance with, the requirements of a Federal benefit program.					
19a. MAILING ADDRESS AFTER SEPARATION (Include ZIP Code) 2009 CANNES DRIVE, PLANO, TX 75025-0000			b. NEAREST RELATIVE (Name and address - include Zip Code) WILLIAM B. SEWALL (FATHER) 2009 CANNES DRIVE, PLANO, TX 75025-0000		
20. MEMBER REQUESTS COPY 6 BE SENT TO (Specify state/locality) OFFICE OF VETERANS AFFAIRS					
a. MEMBER REQUESTS COPY 3 BE SENT TO THE CENTRAL OFFICE OF THE DEPARTMENT OF VETERANS AFFAIRS (WASHINGTON, DC)				YES	x NO
21a. MEMBER SIGNATURE B. E. SEWALL		b. DATE (YYYYMMDD) 20151009	22a. OFFICIAL AUTHORIZED TO SIGN (Typed name, grade, title, signature) ROSELYN ROBINSON DIXON/CWO4/EURPAC DIRECTOR		b. DATE (YYYYMMDD) 20150925

DD FORM 214, AUG 2009

PREVIOUS EDITION IS OBSOLETE.

MEMBER - 1
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