

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

UNITED STATES OF AMERICA)	
)	
v.)	2:08-CR-00245-LSC
)	
LARRY P. LANGFORD)	

**MOTION TO REDUCE TERM
OF IMPRISONMENT TO TIME SERVED**

COMES NOW the United States of America, by Hugh J. Hurwitz, Acting Director of the Federal Bureau of Prisons, and through Jay E. Town, United States Attorney for the Northern District of Alabama, and respectfully moves the Court, pursuant to 18 U.S.C. § 3582(c)(1)(A)(i), to modify the defendant's term of imprisonment to time served, and to begin the thirty six months term of supervised release previously imposed, with the additional special condition requested below. In support hereof, the United States asserts as follows:

1. Defendant Larry P. Langford was found guilty following a jury trial of Bribery, in violation of 18 U.S.C. § 666(a)(1)(B); Money Laundering, in violation of 18 U.S.C. § 1957; Conspiracy, in violation of 18 U.S.C. § 371; Honest Services Mail and Wire Fraud, in violation of 18 U.S.C. §§ 1341, 1343, 1346; and Tax Fraud, in violation of 26 U.S.C. § 7206(1).

2. On March 5, 2010, the Court sentenced the defendant to 180 months imprisonment to be followed by 36 months of supervised release. The defendant was

also ordered to pay restitution and forfeit the proceeds of his crimes. He has a projected good conduct time release date of May 1, 2023.

3. The defendant has been diagnosed with end-stage chronic obstructive pulmonary disease and emphysema, pulmonary hypertension, right heart failure, sickle-cell trait, plantar fascial fibromatosis, bursitis, esophageal reflux with esophagitis, dysphagia secondary to a cricopharyngeal bar and esophageal stenosis, sensorineural hearing loss, pterygium, and anemia. The defendant is considered debilitated under Federal Bureau of Prisons policy and, based upon recent deterioration in his health, his condition is considered by the Bureau of Prisons to be terminal, with a life expectancy of 18 months or less.

4. Pursuant to 18 U.S.C. § 3582(c)(1)(A)(i), the Court, upon motion of the Director of the Federal Bureau of Prisons, may modify a term of imprisonment upon the finding that “extraordinary and compelling reasons” exist to warrant a sentence reduction. The defendant’s debilitated and terminal medical condition and limited life expectancy constitute “extraordinary and compelling reasons” warranting the requested sentence reduction.

4. The United States further requests, pursuant to 18 U.S.C. §§ 3563(b) and 3583(d), that the conditions of supervised release be modified to include up to 36 months of home confinement. The United States Probation Office for the Northern District of Alabama has approved the defendant’s release plan and intends to petition

the Court to modify the terms of supervised release to include up to 36 months home confinement, which may include electronic monitoring by the United States Probation Office.

WHEREFORE, the United States respectfully requests that the Court reduce the term of imprisonment to the time the defendant has now served and order that he begin serving the 36-month term of supervised release previously imposed by the Court. The United States further requests, pursuant to 18 U.S.C. §§ 3563(b) and 3583(d), that the conditions of supervised release be modified to include up to 36 months of home confinement, which may include electronic monitoring by the United States Probation Office.

Respectfully submitted,

JAY E. TOWN
United States Attorney

/s/ George A. Martin, Jr.
GEORGE A. MARTIN, JR.
Assistant United States Attorney