

Jamie McGrady  
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FOR THE DISTRICT OF ALASKA  
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Attorney for Defendant

**UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF ALASKA**

UNITED STATES OF AMERICA,  
Plaintiff,  
vs.  
FLOYD JAY MANN, JR.,  
Defendant.

Case No. 3:16-cr-00091-TMB-DMS  
**NOTICE OF INTENT TO CHANGE  
PLEA**

Defendant, Floyd Jay Mann, by and through counsel, Jamie McGrady, hereby files his notice of intent to change his plea. There is no plea agreement in this case, and Mr. Mann intends to plead to all counts in the indictment.

Counsel for the defendant requested (via email) a written plea agreement on March 6, March 23, March 31, and April 5, 2017. At the status hearing on April 13, 2017, counsel for the government advised the Court that a plea agreement would be provided to the defendant the following week. A plea agreement was sent via email on May 1, 2017.

Many of the statements contained within the factual statement offered by the government are not supported by the evidence thus far provided to the defendant through the discovery process. The restitution amount proposed by the government is not supported by the evidence thus far

provided by the government nor have the names of the alleged victims even been provided by the government to defense counsel.

Mr. Mann wishes to accept responsibility and avoid the specter of a lengthy and costly trial in this matter, but counsel would be ineffective to advise Mann to enter into an agreement not supported by available discovery. Therefore, Mr. Mann has no other option but to plead to all counts in the indictment and leave open for debate the amount of loss and other forms of culpability.

Counsel requests a date in late June or early July for the change of plea, in order to accommodate counsel's work and personal travel and to allow counsel time to meet with Mr. Mann to prepare him for further proceedings. Counsel plans to submit a proposed factual basis for each count in the indictment as a starting point for the open plea.

DATED this 23<sup>rd</sup> day of May, 2017.

Respectfully submitted,  
FEDERAL PUBLIC DEFENDER  
FOR THE DISTRICT OF ALASKA

/s/ Jamie McGrady

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Certificate of Service:

I certify that on May 23, 2017, a copy of the foregoing document, with attachments, was served electronically on:

Andrea T. Steward, Assistant U.S. Attorney

/s/ Jamie McGrady