



January 10, 2022

Honorable Rossie Alston  
Albert V. Bryan U.S. Courthouse  
401 Courthouse Square, 2<sup>nd</sup> Floor  
Alexandria, VA 22314-5704

Re: Joseph Gargan  
Case no.: 1:20-CR-110 (RDA)

Dear Judge Alston:

I am the attorney for the XXXXXXX family and the XXXXXX XXXXXXX Supplemental Needs trust, which was victimized when Joseph Gargan embezzled \$1,032,750.00 which was part of a medical malpractice settlement and which had been earmarked for the Trust. The beneficiary of this trust, XXXXXXXXXXXXXXX, is a severely handicapped and compromised boy.

Via restitution, by way of the U/S. Attorney's Probation Department, Mr. Gargan has now made full repayment of what he stole in this matter. In addition, over the course of the past several months, Mr. Gargan has written to me on several occasions, to express what I believe to be his true regret and remorse over what in his own words were "*inexcusable acts*".

I understand that Joseph Gargan has multiple medical problems and is seeking a compassionate release.

I humbly ask the Court that in considering Mr. Gargan's application, the Court should consider his remorse along with the fact that full restitution to my client has been made by this defendant. If the medical situation warrants possible release, then perhaps continued incarceration would serve no further useful purpose.

In the event that the court has any questions, feel free to contact the undersigned.

Respectfully,

A handwritten signature in black ink, appearing to read 'Michael K. Eidman', written over a white background.

Michael K. Eidman

MKE/de  
cc Joseph Gargan

Michael K. Eidman, Member of NY and NJ Bars

Seymour H. Eidman, NY Bar (1998 - 2019)

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