

Paul M. Ferder, OSB No. 720871  
Ferder, Casebeer & Knodell, LLC  
515 High Street SE  
P.O. Box 843  
Salem, OR 97308-0843  
Telephone: (503)585-9197  
Fax: (503)399-7904  
Email: pferder@ferder.com  
Of Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

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UNITED STATES OF AMERICA,  Plaintiff,  vs.  CATALIN DRAGOMIR,  Defendant.	No. 3:24-cr-00204-SI  <b>DEFENDANT’S SENTENCING MEMORANDUM</b>
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Catalin Dragomir, by and through his attorney Paul M. Ferder of Ferder, Casebeer & Knodell, LLC, hereby submits the following sentencing memorandum. On May 26, 2026, at 11:00 a.m., Defendant Catalin Dragomir, will appear before the Court for Sentencing in this matter. On February 19, 2026, Defendant entered, and the court accepted, a guilty plea to Count 1: Obtaining Information from a Protected Computer in violation of 18 U.S.C § 1030(a)(2)(C), and (c)(2)(B); and Count 5: Aggravated Identity Theft in violation of 18 U.S.C. § 1028A. For reasons outlined in other sentencing materials before the Court, counsel will be moving the Court to sentence Defendant to a period of 12 months with credit for time served on Count One; along with the statutory mandatory 24-month consecutive sentence for Count Five.

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**FERDER, CASBEER & KNODELL, LLC**  
**ATTORNEYS AT LAW**  
515 High St – PO Box 843 – Salem, OR 97308-0843  
503/585-9197\*503/399-7904

Defendant anticipates that government will recommend a sentence within the applicable guideline range as long as Defendant demonstrates an acceptance of responsibility as explained in the Plea Agreement Letter.

Dated 15<sup>th</sup> day of May, 2026

FERDER, CASEBEER & KNODELL, LLC

/s/ PAUL M. FERDER  
PAUL M. FERDER, OSB No. 720871  
Of Attorneys for Defendant