

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

CRIM NO: 26-10119-JEK

v.

PATRICK VAN COTT

SENTENCING MEMORANDUM OF PATRICK VAN COTT

It is springtime in 2020. Schools are closed. The pandemic rages on. Children and families can no longer depend on free school lunches. Patrick, the Director of Food Services for the Plymouth Public Schools, does what he has done for thirty years when anyone needs help: he leans in and does what needs to be done. From his headquarters at Plymouth Community Intermediate School, Patrick coordinates a makeshift food bank in the cafeteria. He organizes pickup and delivery. Buses deliver meals and food to Plymouth students, their families, and others in the community. When drivers are unavailable, he unloads the trucks himself. Patrick has lived a life in service of others. He's coached sports, mentored kids, and parented (his biological children and others). Patrick is reliable and respected.

But Patrick has also served himself. It is June 4, 2025. Plymouth police officers are carrying out a refrigerator, a freezer, a griddle, and a fryolator out of a restaurant that Patrick owns. The equipment was purchased with school money. Patrick is arrested, spends the night in jail, posts \$10,000.00 cash bail, is fitted with a GPS ankle bracelet, and is confined to his home. Days later, he is terminated from his twenty-two-year career with the Plymouth Public Schools. The anonymous letters and phone calls begin. His pension is frozen and jeopardized. His name is plastered over newspapers and in online articles.

Patrick broke the trust he spent twenty-two years earning. He used his position, and the school's money, food, and equipment, to support his personal business. He is ashamed of that, has pleaded guilty, and he accepts the consequences. The question before this Court is not whether Patrick

should answer for what he did, but whether his crimes require a suspension of his freedom. For the reasons below, they do not.

On May 14, 2026, Patrick pled guilty to one count of Theft Concerning Programs Receiving Federal Funds, in violation of 18 U.S.C. § 666(a)(1)(A) (Count One), and two counts of Wire Fraud, in violation of 18 U.S.C. § 1343 (Counts Two and Three). Patrick agrees with the total offense level of 9. Mr. Van Cott respectfully submits that a probationary sentence of twenty-four months is “sufficient, but not greater than necessary.” In the alternative, Patrick avers that any term of home detention the Court deems necessary be treated as satisfied by the 111 days he has already spent confined to his home on GPS monitoring in the parallel Plymouth District Court case.

ARGUMENT

Mr. Van Cott respectfully submits that a probationary sentence of twenty-four months satisfies the purposes of sentencing as set forth in 18 U.S.C. § 3553(a). A sentence of probation is within the Guidelines, consistent with the section 3553 factors, would be reasonable based upon the particular facts and circumstances in this case, consistent with the sentences this Court has imposed on other public employees who’ve committed the same crime, and is “sufficient but not greater than necessary,” to achieve the goals of sentencing. Kimbrough v. United States, 552 U.S. 85, 90 (2007).

The Guidelines Support Probation 18 U.S.C. § 3553(a)(4) and (a)(5)

With a total offense level of 9 and a criminal history score of zero, Patrick’s range falls in Zone B. The Guidelines expressly authorize “a sentence of probation that includes a condition or combination of conditions that substitute intermittent confinement, community confinement, or home detention for imprisonment[.]” USSG § 5C1.1(c)(3); *see* USSG § 5B1.1(a)(2).

A probationary sentence with a home-detention condition is within the Guidelines. Further, because Patrick is a zero-point offender under USSG § 4C1.1, the commentary instructs that “a

sentence other than a sentence of imprisonment . . . is generally appropriate.” USSG § 5C1.1, cmt. n.9. This is confirmed in the data. Consider that over fiscal years 2021 through 2025, 351 defendants nationwide, excluding those who received § 5K1.1 substantial-assistance departures, were sentenced with § 2B1.1 as their primary guideline, a final offense level of 9, and Criminal History Category I. The median sentence for that group was zero months; nearly half (48%) received probation or a fine only; and the average sentence across the entire group was two months. PPSR ¶ 115. The government asks this Court to impose a sentence five times the national average for defendants with the same offense level and criminal history, on a 63-year-old with a minimal record who pleaded guilty to an Information.¹

The loss figure deserves less weight than the government gives it. According to the PSR, the loss attributable to Patrick’s crimes is \$30,014.64. Consider that \$13,063.24 of that amount is restaurant equipment the Plymouth Police recovered and returned to the District within days. PSR ¶¶ 26–27. The actual, unrecovered loss is \$16,951.40, the figure Probation and the government both use for restitution. PSR ¶ 112. A sentencing court need not let an overstated loss figure serve as “an unfair proxy for culpability.” United States v. Proserpi, 686 F.3d 32, 37–38 (1st Cir. 2012) (affirming probation and home confinement where the range was 87 to 108 months). The Court should impose a sentence more consistent with the actual loss attributable to Patrick’s crimes and in concert with the relevant JSIN data.

***The Nature and Circumstances of the Offense and the History and Characteristics of
Patrick Vancott Support a Probationary Sentence
18 U.S.C. § 3553(a)(1)***

¹ The Commission’s Judiciary Sentencing Information (JSIN) data are reproduced at PSR ¶¶ 115–117 and in the attached charts. The 52 percent of defendants who received “imprisonment in whole or in part” includes those sentenced to a term of imprisonment with conditions of home detention or community confinement under USSG § 5C1.1.

Pursuant to § 3553(a)(1), a reasonable sentence considers the offense's nature and circumstances as well as Mr. Van Cott's history and characteristics. The First Circuit has instructed that a sentencing court "should consider every convicted person as an individual and every case as a unique study in the human failings that sometimes mitigate, sometimes magnify, the crime and the punishment to ensue." United States v. Martin, 520 F.3d 87, 91 (1st Cir. 2008) quoting Gall v. United States, 552 U.S. 38, 52 (2007).

This case began with an anonymous tip. On June 4, 2025, Patrick was arrested by the Plymouth Police Department and charged with larceny offenses.² The conduct giving rise to that case is the same as it is here. On June 6, 2025, Patrick posted \$10,000.00 cash bail, was fitted with a GPS device, and ordered to home confinement. On September 24, 2025, the orders of home confinement and GPS monitoring were vacated. While battling cancer, Patrick spent 111 days in home confinement.

Patrick's criminal conduct stands in stark contrast to the other side of him: the side that he is known and loved for. Patrick is a father, husband, volunteer, friend, and cancer survivor. As the attached letters of support indicate³, Patrick is beloved by his community. His friends and family write about his selflessness and his abiding desire to help other people. Except for this criminality, he created a life of extraordinarily good works. For over thirty years, Patrick coached three sports and his former players still seek him out.

Patrick supported his wife during her pursuit of earning a PhD. And when his mother-in-law needed private insurance, Patrick stepped in and paid for it. When his sister needed a place to live with her young daughter, Patrick didn't hesitate. He opened his doors. He treated his nephew as a son, and would drive hours to watch his daughter play college basketball.

² See Plymouth District Court, Docket Number 2559CR000764

³ See Reference letters attached at Exhibit 1.

This information is provided merely for context, so that the Court understands and sees Patrick for who he is: a human who, like countless others who have been led astray by some unknown force, would “in the midst of an otherwise exemplary life . . . would do something so self destructive and ill advised.” United States v. Ribot, 97 F. Supp. 2d 75, 85 (D. Mass. 1999).

Patrick apologizes to the people he wronged. He abused his authority and stole by using school funds to equip his own restaurant. He stole deli meat, and he asked a vendor for a false invoice. Those were deliberate choices. They were wrong, and he admits it.

Patrick urges the Court to consider the impact his crimes had on the Plymouth schoolchildren. The equipment has been returned, and thankfully, no child went without a meal during his scheme.

Patrick’s conduct, though serious, does not equate with the prison term recommended by the government. His request that he be sentenced to probation only is not an appeal only to sympathy, but also to reason, as it balances the crimes he has regrettably committed with the fact that he takes full responsibility for his conduct, and has agreed to pay restitution to the affected parties.

Patrick Understands the Seriousness of His Offenses, and a Probationary Sentence Promotes Respect for the Law and Provides Just Punishment for the Offenses
18 U.S.C. § 3553(a)(2)(A) and § 3553(a)(2)(B)

Section 3553(a)(2)(A) requires the Court to consider “the need for the sentence imposed . . . to reflect the seriousness of the offense, to promote respect for the law, and to provide just punishment for the offense.” This sentence should also adequately deter criminal conduct under § 3553(a)(2)(B).

A probationary sentence of twenty-four months reflects the seriousness of the crime, promotes respect for the law, and provides punishment. Patrick appreciates the seriousness of his offenses, is ashamed and remorseful. Patrick’s wrongdoing cost him his reputation, his career, and his pension. It should be noted that the Plymouth Retirement Board voted to commence forfeiture

proceedings under G.L. c. 32, § 15, and ordered that while proceedings are pending, his is ineligible to receive either a return of his accumulated total deductions or retire, nor may his beneficiary have access to his Plymouth Retirement System funds.⁴

The First Circuit has recognized for more than thirty years that a sentencing court may take pre-sentence home confinement into account in fashioning the sentence, even though such confinement earns no statutory credit under 18 U.S.C. § 3585(b). United States v. Zackular, 945 F.2d 423, 425 n.4 (1st Cir. 1991) (“[A] district judge may consider time spent in home confinement, either as a pretrial detainee or after conviction but prior to sentencing, as a factor in determining where, within the appropriate guideline range, to set defendant’s sentence.”). The 111 days Patrick spent in home confinement is the equivalent of a Zone B sentence. USSG § 5C1.1(e)(3) (“[O]ne day of home detention for one day of imprisonment”). To date, Patrick has complied with all terms of pretrial release both in the related state case and in the case at bar. He is the model probationer.

To be sure, probation is not a free pass. “Offenders on probation are nonetheless subject to several standard conditions that substantially restrict their liberty.” Gall v. United States, 552 U.S. 38 (2007). Indeed, “[i]nherent in the very nature of probation is that probationers ‘do not enjoy the absolute liberty to which every citizen is entitled.’” United States v. Knights, 534 U.S. 112, 119 (2001). Moreover, a felony conviction is itself “no small punishment” for Patrick, who has never been convicted of anything of consequence in 63 years.

Here, a probationary sentence promotes respect for the law and provides just punishment for the offense.

A Probationary Sentence Affords Adequate Deterrence
18 U.S.C. § 3553(a)(2)(B)

⁴ See Plymouth Retirement Board Order to Stay attached as Exhibit 2.

Incarceration does not lead to general deterrence. Certainty of consequences, not the severity of punishment, is what generally deters people. The Department of Justice’s own National Institute of Justice has summarized the research: “The certainty of being caught is a vastly more powerful deterrent than the punishment,” and “[s]ending an individual convicted of a crime to prison isn’t a very effective way to deter crime.”⁵ Patrick’s case was widely publicized, and so will be his sentence. No doubt this publication will deter other public employees from engaging in this kind of theft.

Incarceration Is Not Necessary to Protect the Public, as Patrick Will Not Reoffend
18 U.S.C. § 3553(a)(2)(C)

Pursuant to § 3553(a)(2)(C), a sentence that is sufficient, but not greater than necessary, should protect the public from Patrick’s further crimes. There is no such risk here. Patrick is 63 years old. He has a criminal history score of zero, and his only convictions relate to misdemeanor drinking and driving offenses. PSR ¶¶ 48–51. Patrick will never again hold a public position or act as a fiduciary. PSR at 27. The Commission’s research confirms he is among the least likely federal defendants to reoffend. Its 2016 overview found that 30.2 percent of offenders with zero criminal history points were rearrested within eight years, compared to 81.5 percent of offenders with more than ten points.⁶ Further still, [a]ge and criminal history exert[] a strong influence on recidivism. For offenders in Criminal History Category I, the rearrest rate [is] 11.3 percent for offenders age 60 or older.”⁷ Patrick has been under court supervision, state and federal, for sixteen months without a single violation. PSR ¶¶ 5, 53. The public is protected.

⁵National Institute of Justice, U.S. Dep’t of Justice, *Five Things About Deterrence* (May 2016), <https://nij.ojp.gov/topics/articles/five-things-about-deterrence>.

⁶U.S. Sentencing Comm’n, *Recidivism Among Federal Offenders: A Comprehensive Overview* 18 (Mar. 2016), https://www.ussc.gov/sites/default/files/pdf/research-and-publications/research-publications/2016/recidivism_overview.pdf.

⁷U.S. Sentencing Comm’n, *The Effects of Aging on Recidivism Among Federal Offenders* 23 (Dec. 2017), <https://www.ussc.gov/research/research-reports/effects-aging-recidivism-among-federal-offenders>.

A Probationary Sentence Best Provides Patrick with Needed Medical Care
18 U.S.C. § 3553(a)(2)(D)

Under 3553(a)(2)(D), the Court should consider the need for the sentence to provide Patrick with needed medical care. Patrick was diagnosed with prostate cancer in 2023 and is under the continuing care of a radiation oncologist at Cape Cod Healthcare. PSR ¶ 71. His family has a history of cancer, making his case particularly acute. His condition requires regular monitoring by blood testing; he received his first acceptable result only in April 2026, and remission cannot be declared for years. He also experienced acute depression during his home confinement, which his wife, a nursing professor, continues to monitor. PSR ¶¶ 74–75. A probationary sentence allows him to continue his care with his current physicians.

A Probationary Sentence Would Not Create Unwarranted Sentencing Disparity
18 U.S.C. § 3553(a)(6)

Section 3553(a)(6) requires the Court to consider “the need to avoid unwarranted sentence disparities among defendants with similar records who have been found guilty of similar conduct.” A sentence of 10 months does not fit squarely within the range of reasonable sentences for similar conduct.

Thomas Corliss was a Quincy police lieutenant convicted after a nine-day jury trial of ten counts of mail fraud and one count under § 666(a)(1)(A). *United States v. Corliss*, 919 F.3d 666, 668 (1st Cir. 2019). Corliss is different than Patrick. First, Corliss was a police officer found guilty of “double counting.” There is a fundamental difference between a police officer and a food service director. While both positions invoke the public’s trust, a police officer has sworn duties. In Corliss’s case, he received no acceptance-of-responsibility reduction. Here, Patrick waived indictment and pleaded guilty to an Information. His sentence should not fall within two months of what a defendant who went to trial received.

Tania Fernandes was a sitting Boston City Councilor who took a \$7,000 cash kickback from a staff member's publicly funded bonus in a City Hall bathroom, a public-corruption case with a dimension this one lacks. She was sentenced to thirty days' confinement. *United States v. Fernandes Anderson*, No. 1:24-cr-10364-IT (D. Mass.).

Since 2017, judges of this Court have sentenced at least twenty-one public employees under § 666(a)(1)(A). Fourteen received no custody more than one-day, deemed served. Of the seven who were sentenced to custody, six received between one and six months. The seventh, Corliss, went to trial, received no credit for accepting responsibility, and was sentenced to a year and a day. No defendant who pleaded guilty received the ten months the government seeks here.⁸

CONCLUSION

Patrick Van Cott, through counsel, respectfully requests this Court consider the foregoing information when fashioning a sentence sufficient, but not greater than necessary. A term of twenty four months of probation sufficiently satisfies the objectives of section 3553.

September 1, 2026

Respectfully submitted,
Patrick Van Cott,
By his Attorney,

/s/Nathaniel Amendola
Nathaniel Amendola
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⁸ Exhibit 3 lists each defendant, the judge, the date, the restitution, and the sentence, all such data deriving from the U.S. Attorney's Office press releases announcing each sentencing. The figures are restitution as stated in the releases, not Guidelines loss. The chart is limited to public employees sentenced in this District under § 666(a)(1)(A) for theft from their employers.

CERTIFICATE OF SERVICE

Counsel certifies that he has caused a true copy of this motion to be served today on the attorney for all the parties through the CM/ECF system of this District as set forth in the Notice of Electronic Filing and that no party requires service by other means.

/s/Nathaniel Amendola
Nathaniel H. Amendola

Exhibit 1

September 20, 2026

Dear Honorable Judge,

My name is Lisa Van Cott, and I have been married to my husband, Patrick, for nearly 28 years. During that time, I have known him to be a kind, caring, and deeply devoted husband and father to our three children. I am writing to share my perspective on Patrick's character, work ethic, and the many ways he has dedicated himself to serving others throughout his life.

Patrick is one of the hardest-working people I have ever known. Throughout his career with Plymouth Public Schools, he consistently put the needs of students, families, and coworkers before himself. He rarely missed a day of work and routinely worked well beyond expected hours without complaint. One example that stands out to me personally was when Patrick returned to work the day after surgery, despite my strong objections as a nurse. That decision reflected the level of commitment he felt toward his responsibilities and the people depending on him.

Patrick also worked tirelessly to build and expand the food service program within the Plymouth Public Schools system. Through innovation and determination, he helped establish outside catering opportunities that required his involvement during evenings and weekends throughout the year. In addition to managing his regular responsibilities, he personally unloaded truckloads of food and delivered supplies to schools when drivers and custodians were unavailable. Even after extremely long workdays that often began at 5:00 a.m., he would frequently continue completing administrative work at our kitchen table after dinner because he had spent much of the day covering the responsibilities of others.

During the COVID-19 pandemic, Patrick stepped forward in extraordinary ways to support families in the community. He helped establish a food bank within one of the schools and coordinated food pickup and delivery efforts for Plymouth families facing hardship.

Patrick has also devoted an extraordinary amount of time to coaching youth sports over the years. He coached many of our children's teams, including football, girls' and boys' lacrosse, basketball, and soccer, often juggling multiple teams simultaneously. He coached for Sandwich Recreation, Sandwich High School, several travel leagues, and St. John Paul High School. He volunteered countless hours and became well-respected and genuinely loved by both players and parents. To this day, people approach me in the grocery store to introduce themselves to "Coach's wife" and to send well wishes. Hundreds of young people benefited from his patience, encouragement, humor, and mentorship.

Beyond his professional and volunteer commitments, Patrick is an exceptional family man and friend. He is a patient and nurturing father to our children and a supportive husband who stood beside me throughout my pursuit of multiple nursing degrees. When I met Patrick, I was completing prerequisite courses for an Associate Degree in Nursing. Since then, I have earned a BSN, MSN, and ultimately a PhD in Nursing. I do not think I can adequately express the magnitude of emotional support, sacrifice, and additional responsibilities Patrick willingly assumed at home to make those accomplishments possible and to allow me to pursue my goal of

teaching nursing. More recently, he is known to jump in on a moment's notice at Nursing Pinning Ceremonies and Orientations to help prepare and serve food, usher guests, or watch colleague's children during the event.

Patrick is also someone people instinctively turn to in times of need. He has maintained lifelong friendships from high school, college, and earlier jobs, and he remains very close with both his family and mine. When my sister needed a place to live with her one-year-old child and newborn baby, Patrick did not hesitate to open our home to them for several years while she got back on her feet. When my father died at age 56, Patrick immediately stepped in to provide private health insurance coverage for my mother for years until she became eligible for Social Security. During that time, she was diagnosed with breast cancer, and I am certain she would not have received the excellent care she did without that coverage.

For many years, nieces and nephews have stayed with us during summers to take advantage of better job opportunities in the area. Patrick has always been the person family and friends call when they need help moving, repairing a roof, painting a house, or simply getting through a difficult time. He is equally the person people lean on after the loss of a loved one or during a serious illness. After the major snowstorm this winter, Patrick brought out his chainsaw to help neighbors clear fallen trees and took his shovel to clear driveways. His compassion, generosity, loyalty, and sense of humor have touched countless people over the years.

I recognize the seriousness of these proceedings, and I do not write this letter to excuse lapses in judgment or minimize the Court's responsibilities. Rather, I hope to provide insight into the character of the man I have known and loved dearly for nearly three decades- a man who has spent much of his life working hard, helping others, supporting his family, and giving back to his community.

Thank you for your time and consideration.

Respectfully,
Lisa Van Cott



608-771-9550

608-862-6858

www.UACC.cc

August 13, 2026

To the Honorable Julia E. Kobick,

Re: Letter of Mitigation for Sentencing - Patrick Van Cott, 2026-08-12-30781

I am writing to respectfully request your consideration of compassionate factors in the sentencing of patient, Patrick Van Cott, in connection with one count of theft concerning programs receiving federal funds and two counts of wire fraud. As a healthcare provider at Urology Associates of Cape Cod, I believe it is important to bring certain medical circumstances to your attention that may be relevant to your sentencing determination.

Patrick Van Cott is currently managing a diagnosis of prostate cancer, Gleason Score 6, for which he underwent brachytherapy treatment. While the overall prognosis is favorable with good expected survival outcomes, his clinical situation presents significant ongoing challenges:

Complex Medical Burden: Beyond his primary cancer diagnosis, Patrick Van Cott carries substantial comorbidities that complicate his health trajectory and require careful medical management and monitoring.

Significant Family History: Patrick Van Cott has a strong family history of cancer. This hereditary risk, combined with his current diagnosis, creates substantial psychological stress and medical uncertainty regarding his long-term health outcomes, even with successful initial treatment.

Psychological Impact: The burden of cancer treatment and fear of recurrence, coupled with the stresses of the legal proceedings, significantly impacts his mental health and overall well-being during this vulnerable period.

While prostate cancer at this stage carries relatively lower immediate mortality risk, the cumulative stress, medical uncertainty, and need for ongoing surveillance and care represent a considerable hardship that this patient faces.

I respectfully request that these medical and humanitarian factors be weighed in your sentencing consideration.

Respectfully submitted,

Mark Tyo, FNPP-BC

Caring for the Cape & Islands for Over 40 Years

YARMOUTHPORT SANDWICH NORTHFAIRMOUTH

Melissa J. Van Cott
30 Lakeview Drive
Sandwich, MA 02563

14 May 2026

Dear Honorable Judge:

My name is Melissa, I am 24 years old, I work the overnight shift at a nursing home as a CNA, and I currently live on Cape Cod with my parents (Patrick and Lisa) and my eldest brother (Nic.) I am writing on behalf of my father today, his name is Patrick Van Cott. I apologize in advance for my lack of knowledge on writing character reference letters. Google could have given me a potentially erroneous template, but I digress. My letter will talk about my close relationship with my father pulling memories from my formative years, adolescence, and all the way up to the current. Overall, I hope to demonstrate a man (my father) that is considerate, kind-hearted, and above all, brings out the best in others.

To start, I was born on 9/11/2001 so I cannot even fathom the amount of fear instilled in my parents to raise three small children after the shock of that tragedy. My father was always very loving growing up. To others, I was considered a “daddy’s girl” as he and I spent a lot of time together. Some of my earliest memories revolve around food due to the fact that I was an extremely picky eater. While cooking for the entire family, he would throw on a separate pan and pot and cook up a common staple in my selective diet: a hotdog and mac n’ cheese. Looking back on this, I can now see that it was probably quite annoying to have to make an entirely separate meal, but he did it and never once complained. Outside of food, my father and I loved participating in sports: me the player and him the coach. In an attempt to find my interests and keep active, my parents encouraged me to at least do a trial run of all of the sports from tee ball to soccer to cheerleading and all activities in between. I ended up playing sports all year long, settling on swimming, basketball, and lacrosse at the time. My father became the coach of my basketball and lacrosse teams right when things became “competitive,” as they do in girl’s 4th grade sports in your hometown. As a coach, my father was electric on the field and the court.

Even at such a young age, I could tell that he had such a passion for passing on his knowledge and wisdom, not even sport-specific all the time, but just about life in general. My teammates loved him to death and I have the fondest memories of just sheer joy when we were together. He would always find a way to make everyone feel included and uplifted and to just laugh. There was a sense of community that he created. He continued to coach my sports teams all the way up through high school and I never once doubted that he was the best man for the position. His nature was everything that a good leader should have: inspiring, honest, and a person that everyone could go to for anything.

You would have thought that after spending the better part of each day together throughout my childhood, that my father and I might get tired of one another or maybe that we would have had a lot of arguments. It never really was like that though. We are best friends and I feel like I can tell him anything, so much so that when I was missing home after moving into college I would call him nearly everyday. He would always pick up that phone, even when we had nothing to talk about. On top of that, my father would end up coming to all but one of my club basketball games during my four year college career at UMass Amherst. As our number one dedicated fan, he would bring us baked goods each game and cheer us on from the stands like he always has done for me in all the time I have known him. He even traveled to Erie, Pennsylvania for our national tournament one year, a 9 hour drive, just to watch me play the sport that we loved.

My father has always been there for me, even in my adulthood which I am still navigating. I am currently allowed to live at home while I work full time and pursue my associates degree in nursing, a post-graduation career change. Although a daunting switch in my early 20s, my father has eased my anxieties about taking that leap. He has always supported me and made sure that I knew I was able to pursue my passions, just that it may take time and patience.

I understand the seriousness of this matter, and I know that everything will work out as it should. But I am hoping and praying that some sort of leniency can be granted. I am aware that a single letter or even a thousand of them made of my words will most likely not have the power to completely change a judge's decision. But I would write a million letters for my father if I had to

because I think he is an honorable man that can make mistakes, all of us alike. I appreciate you taking the time out of your busy day to read my (possibly long-winded) writing, thank you.

Sincerely,

Melissa J. Van Cott

Re: Patrick VanCott

To the Honorable Judge:

My daughter, Lisa, is married to Patrick VanCott. My name is Carol Billingsley, and I have had the privilege of being Patrick's mother-in-law for more than 30 years.

During that time, I have had countless opportunities to observe Patrick's character, values, and conduct. Based on my personal knowledge and experience, I can confidently say that he is an honest, kind, and deeply caring individual.

Patrick consistently demonstrates genuine concern for his family, friends, and community. He is dependable, compassionate, and always willing to help others when they are in need. Over the years, he has generously given his time to community activities, coached youth sports, supported neighbors, and served as a positive role model to those around him.

What stands out most about Patrick is that his actions have always matched his words. His integrity, strong work ethic, and commitment to helping others have remained constant throughout the decades I have known him.

After more than 30 years of observing Patrick in both his personal and community life, I believe he is a person of exceptional character who has earned the respect, trust, and admiration of family, friends, and neighbors alike.

For these reasons, I respectfully ask the Court to consider Patrick VanCott's long history of integrity, compassion, and service to others. In the more than 30 years that I have known him, he has consistently demonstrated good judgement, responsibility, and a sincere commitment to his family and community. His character is defined not by a single moment, but by decades of honorable actions and positive contributions to those around him.

I am confident that anyone who has had the opportunity to know Patrick would recognize the same qualities that I have witnessed throughout the years. I respectfully urge the Court to take his exceptional character, strong moral values, and lifelong dedication to helping others into consideration when making its decision.

Thank you for your time and thoughtful consideration.

Respectfully submitted,

Carol Billingsley

Michele L. Billingsley

19 Sunset Drive

South Yarmouth, MA 02664

(774)454-0152

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To the Honorable Court:

I am writing this letter on behalf of my brother-in-law, Patrick VanCott. I have known Patrick for more than 30 years, and during that time I have had the opportunity to know him not only as a member of my family, but as a friend, a father, a coach, a mentor, and someone who has always cared deeply about the people around him.

I am a single parent of two children and have spent my life working hard to provide for my family. I have been involved in real estate for 41 years, including 13 years as a licensed sales agent. For six years I have served as a Federal Field Representative for the United States Census Bureau and am also an Accounts Receivable Representative for Northeast Recycling LLC. I mention this because I understand the importance of hard work, responsibility, providing for your family, and being there for your community. Those are qualities I have always seen in Patrick as well.

For more than three decades, I have watched Patrick put his family first while also giving his time and energy to others. One of the things that stands out most to me is the lasting impact he has had on young people through his years of coaching and mentoring.

I have personally seen the way children respond to Patrick. At games, I have watched kids stop what they were doing simply because they noticed him in the stands or on the sidelines. They would come over to say hello, and after the game they would make a point of finding him again. What has always struck me about these moments is that they were genuine. These children clearly cared about him and were excited to see him. The same is to be said about their parents as well.

As my own children have grown, I have had the opportunity to cross paths with many of the young people Patrick coached. Hearing them talk about him, seeing their excitement when they saw him, and watching the respect they continued to have for him even years later made me realize just how much of an impact he had made on their lives.

Patrick taught these kids much more than how to play a sport. He taught them about teamwork, hard work, communication, accountability, and showing up for the people beside you. He gave them his time, his patience, his encouragement, and his belief in them. Those are lessons that

young people carry with them long after a season ends. That is the Patrick I have known for more than 30 years.

The current charges have been extremely difficult for Patrick and his family. I have seen the weight this situation has placed on him, and I know he has spent a great deal of time reflecting on what has happened. I have seen genuine remorse and a sincere desire to learn from this experience and make positive choices moving forward.

I am not writing this letter to dismiss or minimize the seriousness of the circumstances before the Court. I am writing because I believe it is important for the Court to know that one mistake or one difficult chapter does not tell the entire story of a person's life. I believe Patrick deeply regrets what has happened. I also believe he wants to continue to work towards becoming an even better person as a member of his family and community. Patrick is more than what has brought him before the Court. He is a husband and family man. He is someone who has spent decades giving his time to young people and his community. He is someone whose presence has mattered to families and children who have looked to him as a coach, mentor, and positive influence.

After knowing someone for more than 30 years, you come to know the person; this is difficult to put in a short letter. I see how he treats his family, others in the community, how he responds when someone needs help, and how willing he is to give his time without expecting anything in return. That is the perspective I am able to offer the Court. I can only ask that the Court consider the whole person—the decades of family, work, coaching, mentoring, service, and relationships that have made up Patrick's life, along with the remorse and reflection he is experiencing now.

I have seen firsthand the positive difference Patrick has made in the lives of young people. I hope that, when considering his case, the Court will allow that history and the person I have known for more than three decades to be part of the picture as well.

Thank you for taking the time to read my letter and to consider my perspective on Patrick.

Respectfully,

Michele L Billingsley

The Honorable Julia E. Kobick

United States District Court

District of Massachusetts

Re: Patrick Van Cott

Dear Judge Kobick,

My name is Taylor Van Cott, and I am writing this letter on behalf of my uncle, Patrick Van Cott. I am a firefighter with the Worcester Fire Department, where I have the honor and privilege of serving the great City of Worcester and its residents. I take tremendous pride in my career and in dedicating my life to serving and helping others. The values of service, loyalty, hard work, and being there for people when they need you most are extremely important to me, and many of those values were instilled in me by Pat. His example throughout my life helped shape the man I am today and the way I approach both my career and my responsibility to others.

Pat is my uncle, but that title does not come close to describing the role he has played in my life. Growing up, I did not have a father in my life. Pat stepped into that role for me. He helped raise me, guided me, supported me, and became the father figure that I needed growing up.

That role did not end when I became an adult. To this day, Pat continues to be a father figure in my life. He is still someone I turn to for guidance, someone I can depend on, and someone I know will always be there when I need him. I cannot adequately put into words how much having that kind of constant presence throughout my life has meant to me.

When I think about the kind of man Pat is, one of the first things that comes to mind is how willing he has always been to help others. He is the kind of man who will do anything for anyone without question. Whether it is family, a friend, a neighbor, or simply someone who needs a hand, Pat is the person who shows up. He does not do it for recognition and he does not expect anything in return. That is simply who he is.

Throughout my life, Pat has supported me and cared for me as though I were his own son. He has been there for the important moments in my life and, even more importantly, during the difficult ones. I have always known that if I needed Pat, he would be there without hesitation.

A large part of the man I am today comes from the people who raised me and the examples they set for me. Pat is one of the most important of those people. His loyalty to his family, his generosity, his work ethic, and his willingness to help others are qualities I grew up witnessing firsthand.

Pat is a good man. I say that not simply because he is my uncle, but because I have had a lifetime to see the kind of person he is. I have witnessed his kindness and generosity. I have watched him step up for people when they needed him. And personally, I know what it means to have him step into the role of a father for a child who did not have one.

Pat means more to me than I could ever fully express in a letter. He helped raise me, he has always been there for me, and even today he continues to fill a fatherly role in my life. He is someone I love, respect, and will always be grateful for.

I hope my words provide some insight into the Patrick Van Cott that I have known my entire life and the profound impact he has had on the person I am today.

Thank you for taking the time to read my letter and for allowing me the opportunity to share what Pat has meant, and continues to mean, to me.

Respectfully,

Taylor Van Cott

Dan Kellogg
35 Vanduzer Rd
Cummaquid, MA 02637
508-367-3400

May 13, 2026

Dear Honorable Judge,

I am writing to provide a character reference for Patrick VanCott, my long-time friend and current employee. We have known each other since our college days, and our friendship has remained steadfast through the years. Beyond friendship, we were business partners for several years, and I can speak directly to his character and capabilities.

Patrick is a dependable and loyal friend. He possesses a genuine sense of humor and a charisma that draws people to him. These qualities, combined with his strong work ethic, have defined our relationship since college. He is someone I have always wanted close by—both personally and professionally.

During our years as business partners, Patrick's abilities were invaluable. His natural charisma and work ethic made him exceptional at developing relationships with existing and potential customers alike. His drive kept our business strong and thriving. I recently brought him on to my company, WTP Restrooms, specifically to apply those qualities, his relationship-building skills and work ethic, to help grow my current business and develop strong customer relationships.

Patrick's character speaks for itself. I respectfully ask that you consider his positive attributes and genuine nature as you determine an appropriate resolution.

Respectfully submitted,



Dan Kellogg

Re; Patrick VanCott

To the Honorable Judge,

Throughout my entire life, my uncle, Patrick VanCott, has been a true role model to me. From the earliest memories I have, he has shown kindness, patience, and strength—qualities I deeply admire and strive to emulate. One of the most special parts of my childhood are the memories I have of him swimming alongside my cousins and me, whether at the beach or the pool. Those moments were more than just fun; they were times when he taught us about trust, safety, and the joy of being together as a family.

He was always there, encouraging us to be safe in the water while still having fun. His presence made those summers unforgettable, and the lessons he imparted extended far beyond the pool. He showed us how to care for one another and how to face challenges with confidence. I will never forget those days, and I carry the values he instilled in me every day. My uncle Pat has taught me so many things that I will use throughout my life, and I am so thankful to have an uncle who is genuinely such a good person.

In every way, my uncle has been a guiding light in my life. His influence has shaped who I am, and I am grateful for the love and example he has given me. I hope the court understands the positive impact he has had, not just on me but on all of us who look up to him.

Sincerely,
Carly Traghese

May 10, 2026

Re: Patrick VanCott

To: The Honorable Judge

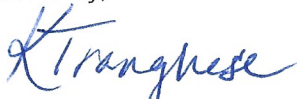
I have known Patrick for over twenty-five years as my brother-in-law and, above all, as a dedicated and loyal family man. Given his character, I was profoundly shocked to hear of the current charges; my immediate reaction was that there must be a mistake. While I do not wish to downplay the severity of these allegations, I feel compelled to provide this reference so the court may consider the man Patrick has proven himself to be over nearly three decades.

Patrick has always been a cornerstone of both our immediate and extended families. To me, he's the big brother I never had—a mentor who stepped up with guidance exactly when I needed it most. When my father passed away the summer before my college graduation, Patrick was my rock. His support during that time reflected the deep-seated values and work ethic he inherited from his own large, dedicated family.

Beyond his family life, I have personally observed Patrick's exceptional work ethic and commitment to the community. He has consistently worked long hours while simultaneously volunteering as a coach for multiple local teams. In our conversations, his passion for his work in school food services was clear; he was deeply invested in improving the quality and appeal of meals for students without compromising nutritional value. His pride in both his players and his own children during their sports seasons further highlights his role as a positive mentor and a dedicated father.

In closing, I respectfully ask that the court take this letter into consideration during the sentencing process. Despite the circumstances of this case, my long-standing view of Patrick remains unchanged: he is an upstanding individual who cares deeply for his family and his community. I appreciate the opportunity to share my perspective on his true character.

Sincerely,



Kristin Tranchese

Ronald Vita
11 Gulf Lane
Coram, NY 11727
(516) 429-5358

5/13/2026

Your Honor,

I am writing this character reference for my friend and fraternity brother Patrick Vancott to show the court how Patrick has been a positive influence to myself and others. I met Patrick in 1981 when he decided to pledge our fraternity Delta Sigma Phi at Alfred University. During his pledging, I noticed something special in Patrick. He was a positive influence with his fellow pledges, mostly by helping them with certain tasks that needed to be accomplished in order to become a brother. During his time with the fraternity, Patrick was always willing to pitch in, along with other brothers, to make sure the house was kept in order. As the house manager, my responsibilities were to make sure the house duties, such as vacuuming, cleaning the bathrooms, mopping and keeping the kitchen clean, were assigned to the brothers to be completed on a weekly basis. As you can imagine, I was not the most popular brother, however, if I needed extra assistance with some repairs, Patrick, at times, would pitch in to assist me. During one of our charity events, I remember Patrick insisting on being Santa for the local children at our party. After graduation, we remained friends and tried to get together, with other brothers, to reminisce and catch up on each other's lives. What impressed me about Patrick, was when my roommate passed away from colon cancer, and Patrick, along with other brothers, came down to New Jersey, in order to support my roommates wife and family. His support continued with the passing of my parents. When my father passed away, I was devastated being he was the first loss I had in my family. Patrick, with some other brothers, were there for me both physically and mentally. That support continued when Patrick lost his father, mother and brother over the years which I'm sure was helpful to him. I have seen Patrick go from a young college student, to a loving husband and father. I look forward to many more get togethers with Patrick and hoping he can attend my 65th birthday celebration at my sister's place in Truro this July.

Thank you, your honor, for taking the time to get a better understanding of Patrick. Should you require any more information on Patrick's character, feel free to have the court contact me.

Best Regards,

Ronald Vita

May 10, 2026

To Whom It May Concern,

I am pleased to write this character letter on behalf of Patrick VanCott. I have had the opportunity to know Patrick for the past eleven years, and during that time, he has consistently demonstrated integrity, compassion, and a strong commitment to his family and community. I first met Patrick through his wife, Lisa VanCott, who was a classmate of mine in the PhD program at UMass Dartmouth.

Patrick is a dedicated family man who cares deeply for his wife and children and consistently places family values at the center of his life. He leads by example, demonstrating kindness, responsibility, and strong moral character both at home and in the community. He has supported two brothers with cancer and both of his parents through chronic illness.

Patrick has dedicated countless hours to coaching both basketball and football, serving not only as a coach but also as a mentor and role model to young athletes at St. John Paul and Sandwich. Through patience, discipline, and encouragement, he has helped many students build confidence, teamwork skills, and respect for others both on and off the field. His positive influence extends far beyond sports.

In addition to coaching, Patrick is known throughout the community as a dependable, caring, and hardworking individual. During the COVID-19 pandemic, he regularly volunteered his time to support local events and assist children experiencing food insecurity. He treated everyone with fairness and respect. His willingness to help others and contribute to the well-being of the community speaks volumes about his character.

I can confidently say that Patrick is someone who consistently demonstrates honesty, responsibility, and compassion.

Please feel free to contact me if you need any additional information.

Sincerely,

Mirinda Tyo

2 Maple Swamp Rd

East Sandwich MA 02537

cell (774) 313-7092

May 10, 2026

To Whom It May Concern,

I am writing this letter in support of Patrick VanCott and to speak to his character and integrity. I have known Patrick for approximately 10 years, and throughout that time I have come to know him as a hardworking, dependable, and genuinely caring man who consistently puts others before himself.

Patrick is a devoted family man who takes great pride in being a supportive husband and father. The care he exhibits toward his family is reflected in the way he manages and cares for others in his circle. He demonstrates strong values, responsibility, and compassion. He showed his strength of character and family leadership recently with the passing of his mother and brother, buoying his family in NY as well as taking care of his family here on Cape Cod.

He has also made a lasting impact in the community through his dedication to coaching basketball and football. Patrick mentors young athletes, teaching them not only the fundamentals of sports but also the importance of teamwork, respect, and perseverance. Beyond coaching, Patrick has always been someone willing to step up and help others whenever needed. He is the type of person people can rely on, and he treats everyone with fairness and kindness.

In my experience, Patrick Van Cott has demonstrated strong moral character, honesty, and integrity. I have the utmost respect for him

Please feel free to contact me if you need any further information.

Sincerely,

Mark Tyo
2 Maple Swamp Rd
East Sandwich, MA 02537
Cell 508-237-5004

Your Honor - I've known Pat for the better part of 45 years and I'm proud to say he is my friend and brother. I met Pat in the fall of 1981 at Alfred University and he is one of the main reasons I decided to join the Delta Sig fraternity. Although Pat was a year older than me at college, he treated me as an equal, as a friend and I'm proud to say as his brother. College is an interesting time in people's lives and living with 30 guys gives you a great appreciation for who people really are. Pat was always the first person to lend a hand and would always have my back if I was ever in a jam...no questions asked. How can I help? That was Pat. I never questioned his friendship, loyalty or character then, and I still don't have a reason to now.

Pat has been a loyal, hard-working, trust-worthy friend since our time at Alfred and he has remained that way for 45 years. He was at my wedding, I was at his wedding, we've vacationed together and our families still spend time together after all these years. Pat is a dedicated father who participated in his kids lives by coaching youth sports and supported his family while his wife earned her PhD.

When I first heard about these "charges", I could not believe it...and still don't believe it. This had to be a mistake. Had to be some kind of misunderstanding....none of this makes sense. The Pat I know would never do what he is being accused of. I believe that when he is able to tell his side of the story, that he will be fully exonerated and I just hope & pray his reputation will be fully restored. My opinion of Pat has not and will not change, and I'm still proud to say he is my friend and brother.

Sincerely,

Andy Kovachik

Andy Kovachik

EVP, COO

Elite Sampling & Media Group

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CELEBRATING



Exhibit 2

COMMONWEALTH OF MASSACHUSETTS

PLYMOUTH, ss

PLYMOUTH RETIREMENT BOARD

)
IN THE MATTER OF:)

)
PATRICK VAN COTT)
_____)

To: Kelly Gonzalez, Esquire (Plymouth Public Schools)(kgonzalez@long-law.com)
Nate Amendola, Esquire (Patrick Van Cott) (nate@amendolallc.com)

ORDER TO STAY

On September 3, 2025, in my capacity as the duly designated Hearing Officer for this matter, I notified Mr. Van Cott and the Plymouth Public Schools (“PPS”), through its counsel, of the Plymouth Retirement Board’s (“Board”) vote to commence proceedings pursuant to M.G.L. c. 32, § 15(1), alleging that Mr. Van Cott has misappropriated the PPS’ funds and/or property. The parties were advised to preserve all evidence pertaining to this matter. That order remains in effect.

On October 7, 2025, I held a pre-hearing status conference with counsel to discuss the most efficient way to proceed with this matter, in light of the fact that there is a parallel criminal matter pending in the Plymouth District Court pertaining to the same or similar charges as the Board would be reviewing. Upon discussing the matter with counsel, and allowing for the opportunity to each confer with their respective clients, it was agreed that this matter will be stayed pending resolution of the criminal matter.

The parties are hereby ordered to provide an update to me as to the status of the criminal case every six (6) months, unless the matter is resolved sometime during the 6-month interval, which will then require the parties to advise me of the case’s resolution. At any time during the stay, either party may petition, either separately or jointly, to have the stay lifted by filing a motion, to be served on the other party and on the Hearing Officer electronically. The first status update is due to be filed on **April 14, 2026**.

This proceeding is hereby **STAYED**. During the stay, Mr. Van Cott will not be eligible to receive either a return of his accumulated total deductions or retire, nor will his beneficiary have access to his Plymouth Retirement System funds.

So ordered.

/s/ Michael Sacco

Michael Sacco, Esquire
Hearing Officer

Date: October 14, 2025

cc: Plymouth Retirement Board

EXHIBIT 3

Defendant	Position	Conviction	Restitution	Judge	Sentenced	Sentence
Eric Chin	MSP Trooper	§ 666(a)(1)(A)	\$7,125	Stearns	3/25/2019	1 day (served); 1 yr SR w/ 3 mo home detention
Gregory Raftery	MSP Trooper	§ 666(a)(1)(A)	\$51,377	Young	3/26/2019	90 days; 1 yr SR
Kevin Sweeney	MSP Trooper	§ 666(a)(1)(A) + wire fraud	\$11,103	Gorton	5/10/2019	2 months; 1 yr SR w/ 3 mo home detention; \$4,000 fine
David Wilson	MSP Lieutenant	§ 666(a)(1)(A)	\$12,450	Stearns	6/4/2019	1 day (served); 2 yr SR w/ 6 mo home detention
Heath McAuliffe	MSP Trooper	§ 666(a)(1)(A)	\$7,860	Casper	6/4/2019	1 day (served); 1 yr SR w/ 6 mo home detention; \$4,000 fine
Gary Herman	MSP Trooper	§ 666(a)(1)(A)	\$12,468	Zobel	6/20/2019	1 day (served); 1 yr SR w/ 3 mo home confinement
Paul Cesan	MSP Trooper	§ 666(a)(1)(A)	\$29,287	Woodlock	6/24/2019	1 day (served); 1 yr SR; \$5,500 fine
Marilyn Golisano	BPD clerk	§ 666(a)(1)(A) + 6 cts wire fraud	\$29,000	Gorton	3/14/2022	90 days; 3 yr SR w/ 3 mo home confinement
Daren DeJong	MSP Trooper	§ 666(a)(1)(A)	\$14,062	Wolf	5/26/2022	2 yr probation w/ 6 mo home confinement; \$5,500 fine
William Baxter	BPD Sergeant	§ 371 + § 666(a)(1)(A)	\$9,223	Saris	6/20/2024	3 yr SR w/ 7 mo home detention; \$20,000 fine
Joseph Nee	BPD Officer	§ 371 + § 666(a)(1)(A)	\$12,636	Saris	6/20/2024	2 yr probation; \$2,000 fine
Craig Smalls	BPD Officer	§ 371 + § 666(a)(1)(A)	\$16,252	Burroughs	7/10/2024	2 yr probation; \$16,000 fine
Thomas Nee	BPD Officer	§ 371 + § 666(a)(1)(A)	\$16,151	Stearns	7/12/2024	2 yr SR; \$2,000 fine
George Finch	BPD Sergeant	§ 371 + § 666(a)(1)(A)	\$11,310	Sorokin	7/23/2024	3 yr probation w/ 6 mo home detention
Michael Murphy	BPD Officer	§ 371 + § 666(a)(1)(A)	\$16,014	Gorton	7/23/2024	2 yr SR; \$5,000 fine
Gerard O'Brien	BPD Sergeant	§ 371 + § 666(a)(1)(A)	\$25,930	Gorton	8/2/2024	2 yr SR w/ 6 mo home detention; \$5,000 fine
Diana Lopez	BPD Officer	§ 371 + § 666(a)(1)(A)	\$36,028	Gorton	8/6/2024	6 months; 2 yr SR; \$5,000 fine
James Carnes	BPD Officer	§ 371 + § 666(a)(1)(A)	\$20,106	Gorton	8/9/2024	2 yr SR w/ 6 mo home detention; \$5,000 fine
Rosa Famania	Framingham Housing Auth. acct. asst.	§ 666(a)(1)(A)	\$70,649	Saris	4/26/2017	5 months; 3 yr SR, 5 months of residential or inpatient substance abuse facility
Thomas Corliss (Gov't comparator)	Quincy PD Lieutenant	Jury: 10 cts mail fraud + § 666(a)(1)(A); no acceptance	—	Sorokin	9/7/2017	1 yr + 1 day; 1 yr SR
Tania Fernandes Anderson (Gov't comparator)	Boston City Councilor	§ 666(a)(1)(A) + wire fraud (kickback)	\$13,000	Talwani	9/5/2025	1 month; 3 yr SR