

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
ABINGDON DIVISION**

UNITED STATES OF AMERICA)
)
) **Case No.: 1:24-CR-00017-003**
V.)
)
JONATHAN SCOTT WEBB)

GOVERNMENT’S SENTENCING MEMORANDUM

The United States of America, by counsel, having considered the facts and circumstances of this case, and the sentencing factors set forth in 18 U.S.C. §3553(a), respectfully recommends that Jonathan Scott Webb (“J. Webb”) be sentenced to a term of incarceration of 41 to 51 months, followed by two years of supervised release.

At this time, the government does not intend to call any witnesses or present any exhibits. The Presentence Investigation Report (“PSR”) and Agreed Statement of Facts accurately describe J. Webb’s conduct and role in the conspiracy to defraud the United States. *See* ECF No. 377; ECF No. 489 ¶¶ 7–21 & 104–130. This conduct resulted in the payment of \$32,589 in unemployment benefits that J. Webb was ineligible to receive. ECF No. 489 ¶ 130. J. Webb is also responsible for \$158,974 in benefits collectively received by codefendants Brian Addair, Josef Brown, Jeramy Farmer, Daniel Horton, Justin Meadows, Crytal Shaw (J. Webb’s girlfriend), Christopher Webb (J. Webb’s brother), and Terrence Vilacha, for a total loss amount attributable to J. Webb of \$191,563. *Id.* ¶¶ 115, 130.

The PSR correctly calculates J. Webb’s total offense level of 15 and criminal

history category of VI. *Id.* ¶¶ 363, 378. J. Webb’s guideline imprisonment range is 41 months to 51 months and the guideline range for a term of supervised release is 1 year to 3 years. *Id.* ¶¶ 403, 406.

J. Webb’s offense is a serious offense. According to the United States Department of Labor, Virginia paid approximately \$1.1 billion in fraudulent unemployment claims between April 1, 2020, and March 31, 2021.¹ By participating and playing a central role in this conspiracy to defraud the United States, J. Webb contributed to the rampant and costly fraud that occurred during the COVID pandemic.

J. Webb is 41 years old and his criminal history spans his entire adulthood, starting at age 19, and includes a drug distribution charge; burglary, larceny, and related crimes; assault and battery; and various other crimes. *Id.* ¶¶ 366-375. J. Webb and his brother, a co-defendant in this case, were raised by their parents in a stable domestic environment. His only health issues are anxiety and depression, for which he is prescribed medication. *Id.* 388-390. He has a history of abusing substances, including marijuana, opiates, benzodiazepines, cocaine, heroin, methamphetamine, and fentanyl. He has received suboxone and methadone treatment for his substance abuse in the past. *Id.* ¶¶ 391-398. J. Webb left high school in the tenth grade due to drug use, but eventually obtained his GED. He is skilled in masonry work. He previously owned a lawn care company and was a truck driver with a Class A Commercial Driver’s License until he lost that license after

¹ *Unemployment Insurance Payment Accuracy Datasets*, U.S. Department of Labor, <https://www.dol.gov/agencies/eta/unemployment-insurance-payment-accuracy/data> (last visited Dec. 23, 2024).

receiving a drug charge. *Id.* ¶¶ 399-400.

A sentence within the guideline range of 41 to 51 months would provide just punishment, promote respect for the law, deter J. Webb and others from future criminal activity, and protect the public from future crimes of this defendant. Accordingly, the government submits that a sentence of 41 to 51 months is sufficient but not greater than necessary and would serve the factors in § 3553(a).

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on December 26, 2024, I electronically filed the foregoing Sentencing Memorandum with the Clerk of Court via the CM/ECF system, which will send notification of the filing to all counsel of record in this matter.

/s/ Danielle Stone, VSB # 84503