

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

CHARLESTON DIVISION

UNITED STATES OF AMERICA

v.

Criminal No. 2:23-00112

IMEESHA BRADLEY

MOTION FOR EARLY TERMINATION OF PROBATION

Defendant, Imeesha Bradley, through Assistant Federal Public Defender Emily L. Szopinski, moves this Court pursuant to 18 U.S.C. § 3564(c) and requests the Court terminate the remaining portion of her five-year term of probation. In support of this Motion, Ms. Bradley states as follows:

1. On January 9, 2024, Ms. Bradley appeared before this Court for sentencing in conjunction with her guilty plea to a single count of receipt of stolen money in violation of 18 U.S.C. § 2315. Dkt. No. 28.

2. Ms. Bradley's underlying offense involved applying for and receiving the proceeds of a Paycheck Protection Program Loan. Ms. Bradley received this money during the pandemic, which was a financially trying time for her as a single mother of two young children. Ms. Bradley used the proceeds of the loan to purchase clothes and shoes for her children, help family members who needed money for groceries or who were behind on rent because of the pandemic, and provide financial support to her sister who was about to start college in South Carolina and who was recovering from a traumatizing incident.

3. Ms. Bradley was sentenced to a sixty-month term of probation. Dkt No. 29. As part of her judgment, Ms. Bradley was also ordered to pay restitution in the amount of \$18,703.00. *Id.*

4. Pursuant to 18 U.S.C. § 3564(c), the Court may terminate probation after one year after consideration of the 18 U.S.C. § 3553(a) factors, if such action is warranted by the conduct of the defendant and the interests of justice.

5. Ms. Bradley has served 26 months of her term of probation.

6. Since her sentencing in this case, Ms. Bradley has made consistent payments towards her restitution. *See* Dkt Nos. 33-34, 36, 38-52. Additionally, Ms. Bradley's tax returns have been garnished and applied towards her restitution.

7. Accordingly, as of March 25, 2026, Ms. Bradley has satisfied her restitution obligation.

8. Ms. Bradley has been residing in Jacksonville, Florida, for the pendency of her probationary period. There, she established a strong community within her church.

9. Ms. Bradley has three young children who are the main priority in her life.

10. Ms. Bradley has been working with a realty company in Jacksonville where she has been renovating and cleaning properties. Specifically, her duties have included painting, demolition of floors, and staging and cleaning the properties.

11. Prior to the instant offense, Ms. Bradley had never been arrested or charged with another criminal offense. She has continued to live a law-abiding life while serving her term of probation.

12. Since Ms. Bradley was released on bond on August 1, 2023, she has not had any non-compliance violations related to her pretrial supervision or her probation supervision.

13. The instant offense was clearly an aberration in Ms. Bradley's otherwise law-abiding life, and she has taken great strides to overcome the hurdle that her new felony conviction has created.

14. Nevertheless, Ms. Bradley will continue to be marked by the felony conviction and all of its attendant consequences.

15. Ms. Bradley has demonstrated that she has been and will continue to be a law-abiding citizen. In nearly three years of supervision by the United States Probation Office, Ms. Bradley has complied with her release conditions, met her restitution obligation, maintained employment, and continued living a law-abiding life.

16. Ms. Bradley's pre- and post-offense conduct demonstrates that she does not need additional supervision by the United States Probation Office to continue leading a law-abiding life.

17. Additionally, Ms. Bradley's supervising probation officer in the Southern District of West Virginia, Jordan Clark, supports Ms. Bradley's request for early termination of her probation.

18. Undersigned counsel has attached to this Motion a letter which Ms. Bradley wrote to the Court supporting her early termination of probation. *See Exhibit A.*

19. Additionally, counsel has attached several character letters written by members of Ms. Bradley's community who have gotten to know her over the past several years.¹

In conclusion, Ms. Bradley respectfully requests that the Court terminate the remainder of her term of probation.

Date: March 25, 2026.

Respectfully submitted,

IMEESHA BRADLEY

By Counsel

WESLEY P. PAGE
FEDERAL PUBLIC DEFENDER

s/Emily L. Szopinski

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¹ The character letters refer to Imeesha Bradley as Imeesha Miller as Ms. Bradley primarily goes by her maiden name, Imeesha Miller.