

**UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA
Jacksonville Division**

UNITED STATES OF AMERICA,

v.

Docket No.: 3:24-cr-190-WWB-SJH

**CARNISHA M. ROGERS,
Defendant.**

DEFENDANT’S MOTION FOR CONCURRENT SENTENCING

COMES NOW the Defendant, Carnisha M. Rogers, by and through undersigned counsel, and respectfully moves this Honorable Court to impose a sentence concurrent with any sentence that may be imposed in the pending state prosecution in Florida, pursuant to 18 U.S.C. § 3584(a). In support of this motion, Defendant states the following:

1. Legal Basis

Under 18 U.S.C. § 3584(a), when a defendant is subject to multiple terms of imprisonment—whether imposed at the same time or at different times the Court has discretion to order the terms run concurrently or consecutively. The statute provides:

“If multiple terms of imprisonment are imposed on a defendant at the same time, or if a term of imprisonment is imposed on a defendant who is already subject to an undischarged term of imprisonment, the terms may run concurrently or consecutively...”

2. Pending State Charge

Carnisha M. Rogers is currently facing a pending charge in the State of Florida for *Organized Scheme to Defraud*, a second-degree felony under Florida Statute § 817.034(4)(a)2. This charge arises from conduct that is factually and temporally related to the federal offense for which she now stands before this Court.

3. Mitigating Circumstances

As detailed in the Defendant’s Sentencing Memorandum, Ms. Rogers suffers from bipolar disorder, which was undiagnosed and untreated at the time of the offense. She has since stabilized through treatment and demonstrated remorse and insight. Her conduct was non-violent and driven by impaired judgment rather than criminal intent or greed.

4. In the interest of justice a concurrent sentence would:

- Avoid duplicative punishment for overlapping conduct
- Promote judicial economy and sentencing proportionality
- Facilitate continuity of mental health treatment and rehabilitation

- Reflect the goals of 18 U.S.C. § 3553(a), including just punishment and rehabilitation

5. Request

WHEREFORE, Defendant respectfully requests that this Court exercise its discretion under 18 U.S.C. § 3584(a) to impose a sentence that runs concurrently with any sentence imposed in the pending Florida state prosecution.

Respectfully submitted,

Robert Calvin Rivers
Law Offices of Robert Calvin Rivers
Urban League Building, Suite 101-103
903 West Union Street
Jacksonville, Florida 32204
FBN: 0637210
Email: rriverslaw@yahoo.com
Tel: 904.723.4043

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing motion has been served on AUSA Kevin Frein, Office of the United States Attorney, Jacksonville Division, this 29th day of October 2025.

Robert Calvin Rivers
Robert Calvin Rivers