UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	*	
V.	*	Case No. 1:21-CR-10167-FDS
DONNA WASSON	*	
Defendant.	*	

DEFENDANT DONNA WASSON SENTENCING MEMORANDUM

The Defendant, through counsel, files this sentencing memorandum in support thereof.

The Probation Offer has completed a Presentence Investigation Report (PSR) in which she recommends, on counts 1 – 3, an Advisory Guideline Range (AGR) of 12 to 18 months.[1] The Defendant does not object to the recommended findings. The Defendant contends that there are good and sufficient grounds for the Court to consider imposition of a sentence, consistent with the parties plea agreement, to a term of imprisonment of 18 months. The primary basis for the Defendant's sentencing request fall under the rubric of the "history and characteristics of the defendant". The PSR is replete with information describing the Defendant's absolutely traumatic upbringing, which includes years of physical and sexual abuse at the hands of her father, which it would be fair to say adversely impacted the Defendant during her formative years and well into young adulthood.

The Defendant also has a long history of substance abuse, beginning with the consumption of alcohol at the extremely young age of 6[2]. The Defendant's substance abuse expanded as she grew older to include the use of marijuana, heroin, crack cocaine, and methamphetamine on a daily

[1] PSR ¶ 81.
[2] PSR ¶ 68.

basis, along with the continuing usage of alcohol. The Defendant's substance abuse continued on until the date of her arrest for this offense. The Defendant's substance abuse issues, which the Defendant herself states "has ruined her life"[3], appear to be intertwined with her traumatic and sad upbringing. The Defendant submits that her chaotic upbringing along with her substance abuse history is a significant factor in what brings her before this Court.

In addition, the Defendant, although having prior convictions for other offenses, has not previously been incarcerated. The parties joint recommendation of an 18-month period of incarceration is a significant period of detention for the Defendant and is at the high end of the AGR. As a result, the Defendant submits that the recommended 18-month period of incarceration meets the goals of sentencing with respect to specific deterrence for the Defendant and general deterrence for others who may consider engaging in similar type conduct.

The Defendant submits that when the Court takes all of these factors fully into consideration, in light of the statutory purposes of sentencing, it will conclude that the proposed 18-month prison sentence is more than sufficient to address all of the factors, as outlined by 18 U.S.C. § 3553, that this Court should consider in imposing a sentence.

Respectfully submitted,
Donna Wasson,
By her Attorney,

Date: March 8, 2022

/s/ Paul J. Garrity

Paul J. Garrity, Bar No. 555976
14 Londonderry Road
Londonderry, NH 03053
603-434-4106
garritylaw@myfairpoint.net

[3] PSR ¶ 68.

CERTIFICATE OF SERVICE

I, Paul J. Garrity, herein certify that on this 8th day of March, 2022, a copy of the within Motion was e-filed for all parties involved and mailed, postage pre-paid, to Donna Wasson.

Date: March 8, 2022

/s/ Paul J. Garrity
Paul J. Garrity