

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
At CHARLESTON

UNITED STATES OF AMERICA

v.

Criminal No.: 2:24-CR-00192

SHAMIESE WRIGHT

SENTENCING MEMORANDUM OF DEFENDANT
SHAMIESE WRIGHT

Comes Now, the Defendant Shamiese Wright, by and through her counsel Michelle Roman Fox and hereby files this Sentencing Memorandum for consideration by this Honorable Court in imposing its sentence on the Defendant. Sentencing is set for **October 29, 2025**, at **11:00 am**.

I. OFFENSE CONDUCT:

On July 14, 2025, Wright plead guilty to Aiding and Abetting Laundering of Monetary Instruments in violation of 18 U.S.C. § 1956(a)(1)(B). Ms. Wright has acknowledged responsibility for her actions and has expressed remorse. She has also agreed to pay restitution in the amount of up to \$18,736.73.

II. GUIDELINE CALCULATIONS:

The Probation Officer correctly calculated Ms. Wright's total offense level as an 8, with a recommended Guideline range of 0-6 months incarceration. In addition, Ms. Wright had 0 criminal history points. Ms. Wright has no objection to the Guideline calculations.

III. 18 USC §3553 FACTORS

The Supreme Court's decision in *United States v. Booker*, 543 U.S. 220 (2005), and the Fourth Circuit's ruling in *United States v. Hughes*, 401 F.3d 540 (4th Cir. 2005), require courts to consider not only the recommended guideline range, but also the sentencing factors set forth in 18 U.S.C. § 3553(a), in determining the appropriate sentence for a particular defendant. The overriding principle and mandate of Section 3553(a) requires district courts to impose a sentence "sufficient, but not greater than necessary," to comply with the four purposes of sentencing set forth in Section 3553(a)(2). The sufficient-but-not-greater-than-necessary requirement is an independent limit on the sentence in that the sentence *must not be greater* than necessary to achieve the sentencing goals of § 3553. In determining the appropriate sentence of "sufficient but not greater than necessary" to comply with the § 3553(a)(2), the court must consider several factors which are: (1) the nature and circumstances of the offense and the history and characteristics of the defendant; (2) the need for the sentence imposed; (3) the kinds of sentence available; (4) the kinds of sentences available under the advisory guideline range of the United States Sentencing Guidelines; (5) any pertinent policy statements issued in the Guidelines; (6) the need to avoid unwarranted sentencing disparity; and (7) the need to provide restitution to any victim of the offense. 18 U.S.C. § 3553(a)(1-7). No factor is given greater weight than any other factor. The Defendant will address those factors which overwhelmingly support a sentence of probation, with zero months incarceration, based upon the unique circumstances of Shamiese Wright.

A. The Nature and Circumstances of the Offense:

Shamiese Wright, with the assistance provided by Lydia Spencer and Kisha Sutton, applied for and obtained a PPP loan when she knew she was not eligible. In exchange for her assistance in completing and submitting the forms, Shamiese Wright paid Kisha Sutton \$3000,

disguised as personal payments, in \$1000 increments. While unequivocally acknowledging her wrongdoing, Shamiese Wright wants this Court to know she was “in a very bad place” when she committed this crime, one that was out of character for her. She was dealing with the infidelity of her husband, severe depression and anxiety, and began hanging out with the wrong people and turned to abusing alcohol and cocaine. She is remorsefully sorry for her actions. Importantly, before her arrest in this case, she recognized she needed to change as her actions were affecting not only her but her children, for whom she had sole custody and responsibility. She has now fully changed her life, and has taken responsibility for her crime, by pleading guilty and agreeing to restitution. Thus, the Court should consider “the circumstances” of her life that Shamiese was dealing with when she committed this crime. Prior to her involvement in this case, Shamiese had no criminal convictions. She lived her life, working and as a law-abiding citizen, raising her two children.

B. History and Characteristics of the Defendant.

As fully set forth in the PSR ¶ 40, Shamiese Wright had a sad and tough childhood. Despite her efforts to have relationship with her biological father, he rejected her and refused to form any relationship with her. Her mother, instead of proving a loving home for her, was engaged in prostitution and drugs. This left Shamiese and her siblings to fend for themselves at a young age and resulted in Shamiese being in and out of foster care.

As an adult, Shamiese was physically and mentally abused by the father of her daughters. She then thought she found a good relationship with her husband, only to have him engage in an extramarital affair. PSR ¶41-42.

Despite all of these difficulties, Shamiese has persevered. She is a loving and caring mother to her thirteen-year-old twin daughters. She is their only parent, and they solely live with her and rely upon her for all emotional and financial support and guidance. She is the one

who makes sure they have food, a place to live, supplies for school, as well as making sure they get to school and behave appropriately, which is sometimes difficult during these teenage years. Their father has never provided any support for them and has never been a part of their lives.

In addition, to providing a loving and supportive home to her daughters, Shamiese works as a home health aid and hopes to go to nursing school. She also provides care for her ill mother.

C. The Need for the Sentence Imposed:

Shamiese Wright understands she committed a crime and unlawfully applied for and received loan funds to which she was not entitled to. She knows she must be punished. However, given her significant family obligations to her twin daughters, as she is their only parent and only support, the sentence imposed in this case should be probation. This sentence will require Shamiese to follow stringent conditions as well as abide by all laws, but will at the same time, not utterly upend the lives of her children. In addition, Shamiese Wright has been on unsupervised release for almost a year since her arrest in this case and has not had any issues on pretrial release. She will also be able to work to pay her restitution agreed to in this case.

D. Kinds of Sentences Available and Policy Statements

Since Shamiese Wright's offense of conviction is a Class C felony, she is eligible for a sentence of probation in lieu of incarceration. In addition, her recommended Guideline range is in Zone A, and she is a Zero-point offender. Thus, pursuant to the advisory notes set forth in USSG §5C1.1, advisory note 10, a sentence other than incarceration is advised and appropriate.

E. The Need for Unwarranted Sentence Disparities:

The three other defendants sentenced in this case, all of which are similarly situated to Shamiese Wright, received a sentence of time served and 36 to 42 months of supervised release. None of these co-defendants received a sentence of incarceration. Thus, Shamiese Wright, in order to avoid an unwarranted sentencing disparity, should likewise receive a non-custodial sentence. Since her offense of conviction is a Class C felony, probation is appropriate.

IV. CONCLUSION

Based upon the factors set forth above, Shamiese Wright requests this Court impose a sentence of probation of 36 months. This sentence will promote justice, will be supportive of Shamiese Wright's parental responsibilities to her children, and is "sufficient but not greater than necessary" to achieve the sentencing goals of 18 U.S.C. §3553.

Respectfully Submitted:

Shamiese Wright

BY COUNSEL

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CERTIFICATE OF SERVICE

I, Michelle Roman Fox, counsel for the Defendant, Shamiese Wright certify on this 15th day of October 2025, I served by CM/ECF filing the following **DEFENDANT SHAMIESE WRIGHTS' SENTENCING MEMORANDUM** upon counsel for the United States of America.

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Shamiese Wright

BY COUNSEL

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