

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 2:24-CR-00192-2

SHAMIESE WRIGHT

GOVERNMENT'S SENTENCING MEMORANDUM

Comes now the United States of America, by Jonathan T. Storage, Assistant United States Attorney for the Southern District of West Virginia and submits this Sentencing Memorandum in aid of sentencing.

I. SENTENCING FACTORS

The United States offers the following analysis relating to the application of the sentencing factors enumerated in 18 U.S.C. § 3553(a). As discussed below, the government requests that the Court impose a sentence of probation.

A. History and Characteristics of the Offender

The defendant is 32 years old and was born in Trenton, New Jersey. The defendant described a tumultuous childhood, including foster care placements during adolescence and her early teen years. She noted her mother was a prostitute when she was involved with the defendant's father. Additionally, her mother suffered from

drug addiction, including crack cocaine abuse. She has no relationship with her father.

The defendant is single and had two twin girls, whose father does not financially support them.

She was expelled from high school, but she subsequently earned her GED.

She has a history of drug and alcohol abuse, including, at times, drinking liquor and ingesting cocaine daily.

B. Nature and Circumstances of the Offense

During the spring of 2021, the defendant aided and abetted Kisha Sutton to obtain a fraudulent Paycheck Protection Program ("PPP") loan through a federal COVID-19 relief program administered by the U.S. Small Business Administration.

The defendant supplied her personal information to her sister, who then passed it on to Kisha Sutton. At the time, Kisha Sutton resided in New Jersey. Kisha Sutton created a materially false PPP loan application in the defendant's name and provided false information and documentation to the lender. Specifically, Kisha Sutton represented that the defendant was self-employed as a "beautician" who had earned \$75,000 in gross income in tax year 2020. Kisha Sutton backed up this claim by falsifying an IRS Form 1040-Schedule C in the defendant's name.

The loan was approved, and the defendant received a \$15,625 direct deposit into his bank account. As payment for her services, the defendant sent three payments to Kisha Sutton through Cash App, which totaled \$3,000.

C. Seriousness of Offense, Deterrence, and Community Protection

The defendant and Kisha Sutton took advantage of a national emergency to enrich themselves. In doing so, they defrauded a financial institution and took steps to conceal their actions.

The government has no reason to believe that the defendant will ever commit a similar offense again, and the defendant is not a danger to the public.

D. Sentencing Options

The applicable Guidelines range in this case is 0-6 months. Based on the facts and circumstances of the case, as well as the government's interest in avoiding sentencing disparities, the government recommends a sentence of probation.

II. CONCLUSION

The government submits that a sentence of probation would be sufficient but not greater than necessary to meet the purposes of sentencing.

Respectfully submitted,

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United States Attorney

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CERTIFICATE OF SERVICE

It is hereby certified that the foregoing "GOVERNMENT'S SENTENCING MEMORANDUM" has been electronically filed and service has been made on opposing counsel by virtue of electronic mail this the 15th day of October, 2025, to:

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