

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION**

UNITED STATES OF AMERICA

Plaintiff,

v.

CASE NUMBER: 2:21-CR-110

NATASHA WEEKS

Defendant.

DEFENDANT'S SENTENCING MEMORANDUM

Defendant Natasha Weeks, by counsel, files this sentencing memorandum to assist the Court in exercising its discretion to impose the minimally sufficient sentence that achieves the statutory purposes of sentencing.

PSR

Ms. Week's objection to including Arizona in the guideline calculation, if sustained, would not affect her sentencing guideline. She is accepting responsibility for her actions and just wants the court to know the accuracy of her crimes. She pled to aiding and abetting the scheme because that is what she did. It is factually accurate as to what happened.

Tatyana Simpson was a co-equal participant in this scheme. She lived with the defendant and had access to her computer and all of her banking and personal information. It was Simpson who actually did the Arizona fraud without Ms. Weeks' knowledge. Simpson had an application for IWD unemployment benefits which was submitted using the 3515 block avenue apartment 11 East Chicago Indiana as the primary mailing address. Simpson admitted to voluntarily providing her Social Security number, date of birth and financial information to other individuals to receive a portion

of unemployment funds received by unknown individuals. One individual in particular was Ariana Spears. Simpson claimed Spears resided in Arizona, but did not have contact information or a physical address for Spears. According to Simpson, Spears never gave Simpson the agreed upon funds for her efforts and information. Also, Simpson's mother, Tashia Simpson, had an application with Arizona which was denied.

At the change of plea hearing before the Magistrate Judge, the parties agreed to strike a portion of paragraph 7e regarding restitution in the plea agreement. The last two sentences of that paragraph were struck at the hearing starting with “in addition to” and ending in “charged in the indictment.”

After the government charged her, Weeks, through counsel, offered to proffer against Tatyana Simpson. The government declined even after it was disclosed to the government that Ms. Simpson was still committing fraud in California. Ms. Weeks is willing to accept responsibility and punishment for the crimes that she actually committed.

History and characteristics of the Defendant

Ms. Weeks has no criminal history of any kind. This is her first contact with the criminal justice system and it has made a serious impression on her. While on pretrial release, she has had no violations. Sending her to prison would not deter her anymore than this felony conviction. The felony conviction will have major ramifications for her employment in the future. She has a number of good qualities as set forth in exhibit A.

The government did seize multiple firearms from her residence which she would ask the court to order the government to return to her family.

A sentence of probation would be sufficient to punish Ms. Weeks considering her history and characteristics.

WHEREFORE, based upon the foregoing, Ms. Weeks respectfully requests this Court to sentence her to probation.

Respectfully submitted,

Northern District of Indiana
Federal Community Defenders, Inc.

By: s/ Matthew D. Soliday
Matthew D. Soliday
2929 Carlson Drive Suite 101
Hammond, IN 46323
Phone: (219) 937-8020
Fax: (219) 937-8021

CERTIFICATE OF SERVICE

I hereby certify that, on February 3, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all parties of record.

s/ Matthew D. Soliday

Date: February 3, 2022

Respectfully submitted,

Northern District of Indiana
Federal Community Defenders, Inc.

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s/ Matthew D. Soliday

To the Honorable Philip P Simon,

My name is Ebony Scales and I am a current full time employee of a well known gourmet meat company in Chicago, IL and also a graduate student of Social Work at Dominican University in River Forest, IL. I've known Natasha Weeks all my life and she is one of the most helpful and resourceful people that I know. She has a genuine concern for others, a concern that may have caused her to put herself at great risk. She is selfless and regards to tarnishing herself for the benefit of the people that she loves. She is my cousin and has helped me on few occasions so I would know.

She's easy to love because she is loving. I have literally witnessed her give the shoes off her feet to a homeless person. She has also been known to provide shelter to people when in need. She is a go to person for many and will help almost anyone with anything.

While she is not perfect, she is certainly generous and selfless and always has good intentions. I understand that she has been found guilty of certain crimes and speaking with her know I know that that is regretfully her situation. I ask that you are lenient in deciding on how she will pay for these crimes. I know that she has way more to offer to society especially with her always being inclined to help others. I personally know she didn't come from much, so she has spent her life trying to find her way. She has made mistakes along the way with many odds against her, so I ask that this not be the defining moment that changes her ability to be the best her, out in the world with her family, children and friends.

Regards,

Ebony Scales 1-26-22

EXHIBIT A

To: Honorable Philip P. Simon Judge
United States District Court
5400 Federal Plaza
Hammond, In. 46320

My Name is Erica Eubanks Aunt of Natasha Weeks I've work for Union Health Service Outpatient Ambulatory Surgical Center for Twenty one years. I've known and been around Ms. Weeks her entire life. Ms. Weeks has always been a kind, given and loving person. As a child growing up her parent always struggle to make ends meet. Once she graduated from High School I've known her to always keep a job and always helping her family any way that she can. Ms. Weeks has always wanted to own her own business. Ms. Weeks have help me on multiple occasion with buying me food and clothing for me and my two kids as I was a single parent struggling as well to make ends meet. Ms. Weeks would always call and check up on me to make sure I'm ok. Even if I tell her I'm ok, she knew I didn't like being a burden to people so she would bring me grocery and clothing anyway. Ms. Weeks has always been a loving mother to her kids. Making sure they are taken care of. Throwing Family Birthday parties for them, taking them to and from school when she didn't have to work. Making sure they have a safe place to live. I am aware of her offenses and I feel she did it so she could help pay her bills and help other people as well. There is no justification for falsely submitting document for gain. I truly believe that if she's given the opportunity to continue raising her children and making some type of payment in returning the monies back she will work very hard in keeping a job and doing so. I'd like to thank you for given me this opportunity to express how I have witness and watch my niece and she grew up.

Erica Eubanks
4337 S. Shields
Chicago, Il. 60609
773-263-4771

Naetta Weeks

2719 165th Hammond Indiana

26th january,2020

To the Honorable judge Phillip P. Simon

Letter of character

I have been asked to write this letter on behalf of my sister, Natasha Weeks. It is my genuine honor to write this letter. I have known Natasha my whole life. She is a great person with a kind heart. When she puts her mind to something she makes sure to see it through. She has made mistakes, as we all have, and has expressed her sorrow towards her mistakes. She is a mom of three and they look up to her.

It is my sincere hope the court takes this letter into consideration at the time of sentencing.

Despite the current case, I still believe Natasha Weeks to be an honorable individual, a valuable member of the community and a good human being.

Sincerely,