

United States Court of Appeals
For the Eighth Circuit

No. 22-1612

United States of America,

Plaintiff - Appellee,

v.

Jessica Harcrow,

Defendant - Appellant.

Appeal from United States District Court
for the Western District of Arkansas - Fayetteville

Submitted: June 22, 2022

Filed: July 6, 2022

[Unpublished]

Before LOKEN, COLLOTON, and KELLY, Circuit Judges.

PER CURIAM.

Jessica Harcrow appeals a sentence imposed by the district court¹ after she pleaded guilty to drug and money laundering offenses. Her counsel has moved to

¹The Honorable Timothy L. Brooks, United States District Judge for the Western District of Arkansas.

withdraw and has filed a brief under *Anders v. California*, 386 U.S. 738 (1967), arguing that the court erred in applying an enhancement under the sentencing guidelines for committing the drug offense as part of a pattern of criminal conduct engaged in as a livelihood.

Upon careful review, *see United States v. Turner*, 781 F.3d 374, 393 (8th Cir. 2015) (standard of review), we conclude that the district court did not err in applying the enhancement. The record supported the court's findings that Harcrow had admitted to investigators that selling drugs was her primary source of income, and that she had accumulated at least \$26,000 over the course of a year. The large quantities of drugs that she admitted distributing supported a reasonable inference that the \$26,000 was a small percentage of the profits that she would have made over the course of a year. *See* USSG §§ 2D1.1(b)(16)(E), comment. (n.20); 4B1.3 comment. (n.2); *United States v. Ford*, 987 F.3d 1210, 1215 (8th Cir. 2021); *United States v. Denson*, 967 F.3d 699, 707 (8th Cir. 2020); *United States v. Berry*, 930 F.3d 997, 999 (8th Cir. 2019).

We have also independently reviewed the record under *Penson v. Ohio*, 488 U.S. 75 (1988), and we find no non-frivolous issues for appeal. Accordingly, we affirm, and we grant counsel's motion to withdraw.
