

United States Court of Appeals
for the Fifth Circuit

No. 25-50326
Summary Calendar

United States Court of Appeals
Fifth Circuit

FILED

January 27, 2026

Lyle W. Cayce
Clerk

UNITED STATES OF AMERICA,

Plaintiff—Appellee,

versus

TIFFANY ALDERIDGE DAVIDSON,

Defendant—Appellant.

Appeal from the United States District Court
for the Western District of Texas
USDC No. 7:24-CR-224-1

Before HIGGINBOTHAM, ENGELHARDT, and RAMIREZ, *Circuit Judges.*

PER CURIAM:*

Tiffany Alderidge Davidson pleaded guilty to escape from custody in violation of 18 U.S.C. § 751(a), and the district court sentenced her to 48 months of imprisonment and three years of supervised release. Davidson raises several challenges to her sentence.

* This opinion is not designated for publication. *See 5TH CIR. R. 47.5.*

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First, Davidson argues that the district court imposed a procedurally unreasonable sentence because it did not explain its reasons for imposing a sentence that it classified as both a variance and a departure. However, she has not shown any plain error in that regard as the district court acknowledged the mitigating evidence and sufficiently explained its reasons for the sentence. *See Puckett v. United States*, 556 U.S. 129, 135 (2009); *United States v. Smith*, 440 F.3d 704, 707 (5th Cir. 2006).

Second, Davidson contends the sentence is substantively unreasonable because the district court did not make an individualized assessment of the 18 U.S.C. § 3553(a) sentencing factors and, in fact, placed too much weight on her criminal history. This argument is unpersuasive as Davidson has not shown that the district court did not account for a factor that should have received significant weight, gave significant weight to an irrelevant or improper factor, or made a clear error of judgment in balancing the sentencing factors. *See Smith*, 440 F.3d at 707-08.

Finally, Davidson asserts the district court erred when it imposed three years of supervised release without providing an individualized explanation. She also raises several constitutional violations that may have impacted the reasonableness of her supervised release sentence. As noted previously, the district court provided a sufficient explanation for its sentence, and Davidson offers nothing more than generalized assertions about constitutional violations. Therefore, Davidson has not demonstrated any plain error related to the imposition of supervised release. *See Puckett*, 556 U.S. at 135; *United States v. Mondragon-Santiago*, 564 F.3d 357, 365 (5th Cir. 2009).

The judgment of the district court is AFFIRMED.