

United States Court of Appeals  
For the Eighth Circuit

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No. 22-2014

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United States of America

*Plaintiff - Appellee*

v.

Aimee L. Rosenbaum

*Defendant - Appellant*

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Appeal from United States District Court  
for the Northern District of Iowa - Eastern

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Submitted: December 30, 2022

Filed: January 12, 2023

[Unpublished]

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Before COLLOTON, SHEPHERD, and STRAS, Circuit Judges.

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PER CURIAM.

Aimee Rosenbaum appeals the sentence the district court<sup>1</sup> imposed after she pleaded guilty to conversion and bankruptcy fraud pursuant to a plea agreement

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<sup>1</sup>The Honorable C.J. Williams, United States District Judge for the Northern District of Iowa.

containing an appeal waiver. Her appellate counsel has moved to withdraw, and has filed a brief under *Anders v. California*, 386 U.S. 738 (1967), arguing that prior counsel provided ineffective assistance during Rosenbaum's post-plea proceedings.

While the appeal waiver does not prohibit ineffective-assistance claims, we decline to consider such claims on direct appeal without an adequately developed record. See *United States v. Ramirez-Hernandez*, 449 F.3d 824, 827 (8th Cir. 2006); *United States v. Hernandez*, 281 F.3d 746, 749 (8th Cir. 2002). We have also independently reviewed the record under *Penson v. Ohio*, 488 U.S. 75 (1988), and have found no non-frivolous issues for appeal falling outside the scope of the waiver. Accordingly, we affirm the judgment, and grant counsel's motion to withdraw.

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