

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

PROVIDENCE, SC.

SUPERIOR COURT

ROBERT MCKINNEY

Petitioner

vs.

PC-2020-

**PATRICIA COYNE-FAGUE,
In her capacity as Director,
Rhode Island Department of Corrections**

PETITION FOR WRIT OF HABEAS CORPUS

INTRODUCTION

This petition seeks the immediate release of Robert McKinney from incarceration at the Adult Correctional Institutions, under the control and custody of the Rhode Island Department of Corrections (RIDOC), to parole supervision by the Rhode Island Parole Board. Mr. McKinney has been incarcerated for almost 29 years. He is now being unlawfully detained despite his eligibility for parole and his satisfaction of the standards for parole by the unanimous decision of the Rhode Island Parole Board, due to the arbitrary, unlawful, and unconstitutional actions of the RIDOC and the acquiescence of the Rhode Island Parole Board in a miscarriage of justice and an unlawful assertion of authority.

Your Petitioner states as follows:

1. Your petitioner, Robert McKinney, is a prisoner presently in the custody of the Rhode Island Department of Corrections (RIDOC).
2. Mr. McKinney is confined at the Adult Correctional Institutions, Cranston, Rhode Island.
3. Mr. McKinney is held by the State of Rhode Island.

4. Respondent Patricia Coyne-Fague is the Director of the Rhode Island Department of Corrections and Petitioner's legal custodian.
5. The Superior Court has jurisdiction to hear the within Petition pursuant to R.I.G.L. §§ 10-9-1 and 10-9-3.
6. Mr. McKinney is incarcerated following his conviction in State v. McKinney, P1-96-1547C.
 - a. Mr. McKinney's initial (controlling) sentence was life imprisonment upon his conviction for murder in the first degree. He was sentenced on June 25, 1997, with a retroactive date of December 29, 1995.
 - b. Based on the same proceedings, Mr. McKinney received a consecutive sentence of ten years to serve based upon his conviction for conspiracy.
7. Parole is an essential part of the Rhode Island criminal justice system. It offers an incentive to inmates to rehabilitate themselves with a goal of becoming contributing and productive members of society. Any prison sentence (excluding sentences of life without parole) imposed in the state courts of Rhode Island that exceeds six months "shall be subject to the parole board[.]" R.I.G.L. § 13-8-8. The Parole Board chairperson and Parole Board members are appointed by the Governor of Rhode Island. See R.I.G.L. §§ 13-8-1 and 13-8-3.
8. Mr. McKinney, serving a life sentence and a ten-year consecutive sentence, is among those prisoners who can be considered for parole.
9. Parole eligibility is prescribed by statute.

10. Under Rhode Island law, R.I.G.L. § 13-8-13 (a)(3), an inmate sentenced to life imprisonment for first degree murder committed after June 30, 1995 is considered eligible for parole after serving twenty (20) years of that sentence.
11. Under Rhode Island law, R.I.G.L. § 13-8-9 (a), an inmate serving a term of 10 years is considered to be eligible after serving one third (1/3) of the sentence, or three and one-third (3 1/3) years.
12. R.I.G.L. § 13-8-10 specifically provides that when a prisoner is serving more than one sentence, “a parole permit may issue whenever he or she has served a term equal to one third (1/3) *of the aggregate time* which he or she shall be liable to serve under his or her several sentences[.]” (Emphasis added).
13. Because of the requirement to aggregate sentences under R.I.G.L. § 13-8-10, Mr. McKinney, as an inmate sentenced to life imprisonment after June 30, 1995 and a consecutive sentence of a term of 10 years, would have eligibility determined by adding the minimum eligibility date of a life sentence to the minimum eligibility date of the consecutive term of years. See R.I.G.L. § 13-8-10.
14. Under the requirement to aggregate sentences, Mr. McKinney’s sentence required him to serve a total of 23 and 1/3 years before being eligible for parole (20 years for the controlling life sentence and 40 months – 3 and 1/3 years - for the consecutive ten-year sentence).
15. When Mr. McKinney was sentenced in 1997, RIDOC calculated Mr. McKinney’s parole eligibility date in accordance with the foregoing aggregated sentence calculation and informed Mr. McKinney that his initial parole eligibility date was April 1, 2019. See Exhibit 1, email of Kim Avedisian, Parole Coordinator, Rhode

Island Department of Corrections, dated October 1, 2018, attached hereto and incorporated herein.

16. In conformance with RIDOC's calculation of the parole eligibility date for Mr. McKinney, RIDOC and the Parole Board did not provide Mr. McKinney any notice of eligibility for a parole hearing prior to April 2019 or any opportunity to be brought for a parole hearing prior to April 2019.
17. Mr. McKinney was scheduled for a Parole Board hearing on April 15, 2019. The hearing was continued to May 2019 without action. Minutes for April 15, 2019 reflect that "his life and consecutive sentence were previously aggregated[.]" and that the effect of the aggregation was "now under review." See Exhibit 2, Parole Board minutes of Robert McKinney, attached hereto and incorporated herein.
18. Mr. McKinney was seen by the Rhode Island Parole Board on May 16, 2019. By unanimous vote, his application for parole was granted, with a scheduled release date of December 2019. The Board's minutes, attached hereto and incorporated herein as Exhibit 2, reflect that Mr. McKinney presented home and multiple work plans that "reflect quite a bit of work and rehabilitation." Id. The minutes of this hearing also reflect uncertainty as to whether Mr. McKinney would be paroled from his life sentence to his consecutive sentence, or instead paroled to "the street." The Board minutes reflect that, notwithstanding the unanimous determination of the Parole Board that Mr. McKinney was approved for release from the ACI to begin parole in December 2019, if it was instead determined by RIDOC that Mr. McKinney would not be released from the ACI but would instead be "paroled" to begin serving his 10-year consecutive sentence, the Parole Board would permit him

to write to the Board to request reconsideration of his release date. Thereafter, upon information and belief, the Parole Board continued to await a determination from RIDOC.

19. Upon information and belief, at some point after 2015 and without any notice to Mr. McKinney, RIDOC decided to alter its method of calculating parole eligibility dates for inmates serving more than one sentence, apparently to “disaggregate” sentences so as to determine an initial “parole eligibility date” for the “primary” or “controlling” sentence, and thereby require an inmate with consecutive sentences to first be paroled from the controlling sentence to serve the consecutive sentence, with no possibility of release from incarceration until the inmate has been paroled twice, or for as many separate consecutive sentences as have been imposed upon him.
20. Under this altered method of calculating parole eligibility dates, an inmate serving a life sentence would have to be granted parole under that sentence, and then paroled to his consecutive sentence. The inmate would then be required to serve the minimum eligibility period of the consecutive sentence before seeking parole again, in order to be released from custody.
21. Under this altered method of calculating parole eligibility dates, and without conceding that it is valid under controlling law, Mr. McKinney would first have become eligible to be “paroled” from his life sentence, to begin serving his consecutive ten-year sentence, on December 29, 2015. If Mr. McKinney had been “paroled” from his life sentence in January 2016, to begin serving his consecutive

ten-year sentence, he would have become eligible for “parole” from custody on his ten-year sentence in May 2019.

22. However, RIDOC gave neither Mr. McKinney nor the Parole Board any notice of its alleged redetermination of Mr. McKinney’s parole-eligibility dates so as to enable Mr. McKinney to seek parole consideration by the Parole Board in 2016. This deprived Mr. McKinney of any opportunity to be heard on parole according to RIDOC’s altered methodology and effectively postponed the date of his eligibility for release from incarceration on parole for an additional three and one-third years. It also postponed his opportunity to earn statutory good time and programmatic good time that only applies to inmates with fixed term sentences and not to inmates serving life sentences.
23. Upon information and belief, there has been no material change to the Rhode Island statutes governing parole eligibility, or their interpretation by the Rhode Island Supreme Court, authorizing or justifying this arbitrary action by RIDOC.
24. The Rhode Island Superior Court has addressed this issue previously in McMaugh v. State, PM-17-0563. In McMaugh, a prisoner sought a parole hearing based on the aggregated policy described herein. The state objected, arguing that McMaugh was not entitled to a parole hearing. Justice Vogel granted McMaugh’s request for post-conviction relief, specifically finding that McMaugh’s parole eligibility was established at the time of his sentencing in 1995, noting that his life and consecutive sentences were aggregated pursuant to R.I.G.L. § 13-10-8. See Exhibit 3, Order, McMaugh v. State, attached hereto and incorporated herein.

25. Upon information and belief, the Rhode Island Parole Board has acquiesced in this unlawful recalculation by RIDOC, and, notwithstanding its unanimous determination that Mr. McKinney should be released from incarceration to parole, issued a parole permit merely releasing Mr. McKinney to begin serving *his consecutive sentence* on December 19, 2019. See Exhibit 4, Parole Permit of Petitioner McKinney, attached hereto and incorporated herein.
26. Because RIDOC required Mr. McKinney to wait until April of 2019 to seek parole, and thereafter restricted consideration only to parole to his consecutive sentence, Mr. McKinney has been deprived of three and one-third years of liberty before he can seek his release under RIDOC's altered methodology, which contravenes R.I.G.L. § 13-8-10's provision that sentences should be aggregated for determination of parole eligibility.
27. As a direct result, Mr. McKinney is being unlawfully incarcerated and is entitled to release to the community on parole.
28. Mr. McKinney's continued incarceration constitutes an unreasonable seizure in violation of the Fourth Amendment of the United States Constitution, and Article I, section 6 of the Rhode Island Constitution.
29. Mr. McKinney's continued incarceration deprives him of due process, in violation of the Fifth and Fourteenth Amendments of the United States Constitution, and Article I, section 10 of the Rhode Island Constitution.
30. RIDOC's alteration of Mr. McKinney's terms of sentence so as to increase the amount of time he must serve before consideration for parole eligibility is cruel and

unusual, in violation of the Eighth Amendment of the United States Constitution and Article I, section 8 of the Rhode Island Constitution.

31. RIDOC's alteration of the terms of sentence following his offense, conviction and sentencing so as to increase the amount of time he must serve before consideration for parole eligibility, and keeping him in custody after the Parole Board deemed him qualified for release, violates the Ex Post Facto provisions of the United States Constitution and Article I, section 12 of the Rhode Island Constitution.

WHEREFORE, Mr. McKinney prays this court to

- a. Find that he has been unlawfully detained beyond the terms of his sentence, in violation of the United States and Rhode Island Constitutions;
- b. Grant him his immediate release from custody, pursuant to the recommendation, and subject to the supervision, of the Rhode Island Parole Board;
- c. Enjoin or prohibit Respondent and RIDOC from administering any policy or practice other than the "aggregated" policy in place at the time of Petitioner's 1997 conviction and judgment; and
- d. Grant such further relief as this court deems just and proper.

ROBERT MCKINNEY
By his attorneys,

/s/ Lisa S. Holley
Lisa S. Holley, Esq. (#6606)
Lisa Holley Law
536 Atwells Ave., 2nd Fl.
Providence, RI 02909
(401) 400-2850
lisa@lisaholleylaw.com

/s/ Lynette Labinger
Lynette Labinger (1645)
128 Dorrance Street, Box 710
Providence, RI 02903
(401) 465-9565
LL@labingerlaw.com

COOPERATING ATTORNEYS,
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION OF
RHODE ISLAND

From: Avedisian, Kim (DOC) <Kim.Avedisian@doc.ri.gov>
Sent: Monday, October 1, 2018 11:26 AM
To: Lisa Holley <lisa@lisaholleylaw.com>
Subject: RE: [EXTERNAL] : Eligibility Dates

Hi Lisa,

Robert McKinney's eligibility date calculated in 1997 when Life sentences were aggregated with the consecutive sentence. In his case, he can be paroled to the streets.

's eligibility date was calculated in 2002 on just the Life sentence.

I hope this helps. It was good to see you the other night, I'm so happy for Sally that she is out of that office. Life is too short. Good to see Paula also, nice people who didn't deserve to be treated that way. Take care.

*Kim Avedisian
Parole Coordinator
RI Department of Corrections
Dix Building, 1st floor
1-401-462-3926
Fax: 1-401-462-0765*

From: Lisa Holley [<mailto:lisa@lisaholleylaw.com>]
Sent: Monday, October 01, 2018 7:38 AM
To: Avedisian, Kim (DOC) <Kim.Avedisian@doc.ri.gov>
Subject: [EXTERNAL] : Eligibility Dates

Good Morning Kim,

It was great seeing you last week, if only for a little bit.

I have two cases that I would love you to take a look at the eligibility...

The first is . He states he will be first eligible in 2023.

The second is Robert McKinney #92411. He states April 2019.

Both have a consecutive sentence after a life...so that is where I get baffled! I had understood they would be seen at the first eligible date on the life, regardless of the consecutive, but I have been wrong before and will be wrong again!!

Thanks so much, Lisa

EXHIBIT 1

Parole05.rpt
DATE: 12/31/19

R.I. DEPARTMENT OF CORRECTIONS

*** PAROLE HEARING INFORMATION ***

ID: 092411
AMODR 40
NAME: MCKINNEY ROBERT J
02/15/1975

SEC: MED

D.O.B:

SSNO: 039-40-2310
04/01/2019

ELIGIBILITY DATE:

*** SENTENCE INFORMATION ***

CRT	RETRO	SENTENCE STATUS	YYY	MMM	DDD	GOOD	FULL
	12/28/95	EXPIRATION SENTENCE	0	6	0	06/11/1996	06/27/1996
	12/28/95	EXPIRATION SENTENCE	0	3	0	03/28/1996	03/28/1996
	12/29/95	CONTROLLING SENTENCE	0	0	0		
	06/25/97	CONSECUTIVE	10	0	0		

APRIL 15, 2019
RECONSIDERATION

CONTINUED

This matter is continued to May 2019 in agreement with Mr. McKinney's attorney, Ms. Holley. Mr. McKinney's initial parole eligibility on his life and consecutive sentence were previously aggregated. The impact of that aggregated calculation is now under review. (GTD: LIFE) MEDIUM VOTE: UNANIMOUS-Present; Pisaturo, Almeida, Cade, Pere

MAY 16, 2019
PAROLED

PAROLED

12/2019

Mr. McKinney presents to hearing with legal counsel. The Board considered information reflecting both static and dynamic indicators including, but not limited to, criminal history, police reports(s), institutional record, risk assessment(s) and parole plan/request. We note that the aggregation of his sentences for purposes of parole eligibility is still under review and it is unclear to the Board whether we are paroling him from his life sentence to the community or to his next/consecutive sentence. Notwithstanding, the Board proceeds with a parole hearing today. He has presented both a home and multiple work plans and has an institutional record that reflects quite a bit of work and rehabilitation. After reviewing all materials and his presentation at hearing we find that Mr. McKinney meets statutory parole release criteria and we vote to

parole him with a set off release date of December 2019. If his parole release from the life sentence is to his next-consecutive sentence, then he may write to the Chairperson for an reconsideration hearing related to the set off date. Otherwise, and regardless of any next sentence, we will set conditions on his lifetime parole as follows: a referral to the Vantage Point Pre-Release Program as well as to the Mental Health Services Team, between now and his release to the community. We believe both will offer helpful transitional assistance to him. In addition, weekly mental health treatment for one year upon his release, as well as a psychiatric treatment assessment to determine if he needs medication and other assistance; GPS for thirty days. Any parole release is contingent upon this offender remaining booking free and, in any program, or educational course in which he is currently enrolled. During any period he becomes unemployed (in the community),

CONTINUED NEXT PAGE...

Parole05.rpt
DATE: 12/31/19

R.I. DEPARTMENT OF CORRECTIONS

*** PAROLE HEARING INFORMATION ***

ID: 092411
AMODR 40
NAME: MCKINNEY ROBERT J
02/15/1975

SEC: MED

D.O.B:

SSNO: 039-40-2310
04/01/2019

ELIGIBILITY DATE:

he must document an active employment search and work with his parole officer to perform up to twenty hours weekly of community service. We will schedule this matter for REVIEW in August 2019. (GTD:LIFE) MEDIUM VOTE: UNANIMOUS-Present; Pisaturo, Almeida, Nolan, Cepeda

MAY 29, 2019

MISC

REVIEW

AMENDED 7/17/2019: PER THE CHAIRPERSON, AND AFTER DISCUSSION WITH THE BOARD AND MR. MCKINNEY'S ATTORNEY, MR. MCKINNEY'S AUGUST REVIEW IS VACATED UNTIL FURTHER NOTICE. THE QUESTION OF HIS SENTENCE STRUCTURE REMAINS PENDING. Mr. McKinney will be scheduled for review in August to re-examine the status of his sentence structure and whether the Board's vote to parole is in effect to the community or to his next sent

ence

NOVEMBER 22, 2019

MISC

REVIEW

Mr. McKinney was voted to parole release December 2019, contingent on program completion. He has requested removal of the contingency of program completion and will be scheduled for review December 9, 2019 per the Chairperson. His attorney has been notified. The question of whether he is being paroled to his next sentence or to the streets remains in question (per DOC). L

DECEMBER 9, 2019

MISC

AMEND PAROLE

Mr. McKinney is before the Board for a Review. He wrote to the Chairperson requesting removal of the program contingency placed upon him in May 2019. He is represented at hearing by counsel. After full discussion and considering the question surrounding Mr. McKinney's actual release date to the community through the Re-Entry Collaborative, as well as the availability of resources to him in the community, this panel of the Board votes to remove the program contingency. (GTD: LIFE) MEDIUM VOTE: UNANIMOUS: Present; Pisaturo, Almeida, Armesto, Cad

END OF MINUTES

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PROVIDENCE, SC. SUPERIOR COURT
BERNARD McMAUGH
VS. PM-2017-5673
STATE OF RHODE ISLAND

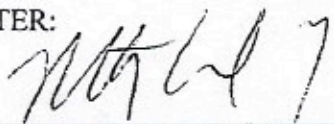
ORDER GRANTING PETITION FOR POST CONVICTION RELIEF

Before the Court on October 10, 2018 came the Petitioner, Bernard McMaugh and the State of Rhode Island, through its Department of Attorney General for hearing on Petitioner's claims for post conviction relief. The Court, the Hon. Netti C. Vogel presiding, found as a fact that the Rhode Island Department of Corrections had, in 1985, clearly and unambiguously set forth Petitioner's eligibility status in a letter by its parole coordinator Patricia Carr. Petitioner's parole eligibility was established in 1995 when his life sentence for murder on Count 2, ten years to serve consecutive to the life sentence on Count 1 on Count 2, five years to serve concurrent with Count 1 were aggregated pursuant to Rhode Island General Laws Sec. 13-8-10. In 2016, Petitioner was paroled which was rescinded in reliance upon the Department of Corrections later recalculation of Petitioner's parole eligibility to include ten years on Count 2, requiring that he serve one third of that sentence after 2016. Therefore he is now parole eligible and hereby:

ORDERED, ADJUDGED AND DECREED

1. The petition for post conviction relief is granted.
2. Petitioner shall be presented to the Parole Board forthwith fully eligible for parole notwithstanding the consecutive ten year sentence on Count 2.

ENTER:


10/18/18

PER ORDER:

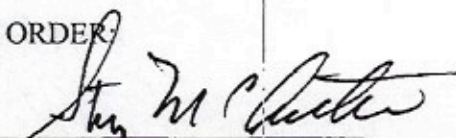

10.18.18

EXHIBIT 3

Presented by:



SUSAN IANNITELLI #3089 10/18/18
IANNITELLI LAW OFFICES
PO BOX 284 GREENVILLE, RI 02828
SUSANIANNITELLI@GMAIL.COM
529-5645



State of Rhode Island and Providence Plantations

DEPARTMENT OF CORRECTIONS

PAROLE BOARD
NO#: 92411

DATE: 12/17/2019

DOB: 2/15/75

Whereas **ROBERT MCKINNEY**

an inmate in the Adult Correctional Institutions of the State of Rhode Island MEDIUM has been held therein upon a sentence of LIFE.

NOW THEREFORE, in accordance with Chapter 8, Title 13, of the General Laws of 1956 as amended, the Parole Board of the State of Rhode Island hereby issues this permit to said inmate to be at liberty under the terms and conditions enumerated below during the unexpired term of his-her sentence, unless this permit shall be sooner revoked or become void.

This permit is granted subject to the following terms and conditions, which the undersigned hereby agrees faithfully to observe:

TERMS AND CONDITIONS

1. I will observe the laws of Rhode Island and the United States and of every jurisdiction where I may be. I will keep the peace and be of good behavior.
2. I agree that the Parole Board may revoke this permit at any time before its expiration after a preliminary hearing to determine probable cause has taken place, or the right to such preliminary hearing is waived by me and after a revocation hearing is held by the Parole Board.
3. I agree that the violation by the holder of this permit or any of its terms or conditions, or the violation of any laws, after appropriate hearings have been granted, may make void said permit.
4. I agree that when this permit has been revoked as herein provided, or there is probable cause for such revocation, the Parole Board may issue an order authorizing my arrest any my return to the place of confinement pending a hearing, and that I shall be detained therein according to the terms of my original sentence; and in computing the period of my confinement, the time between my release upon said permit and my return to the place of my original confinement shall not be considered as any part of the term of my original sentence.
5. I will proceed directly to CONSECUTIVE SENTENCE

The place to which I have been paroled, and within twenty-four hours make my arrival report to Parole Officer located at:

DIX BLDG

WILMA SCHLESSLER LANE

CRANSTON, RI

6. I will not leave the State of Rhode Island, to which I have been paroled, without the written permission of my Parole Officer.
7. I will exert every effort to maintain steady employment and to support those who are dependent upon me.
8. I will carry out the instructions of my Parole Officer, report as directed, and permit him-her to visit me at my residence and place of employment whenever he-she deems such visits necessary. I will not change residence or employment without first consulting my Parole Officer. If for any reason I lose my employment, I will immediately report this fact to my Parole Officer.
9. I will not associate with persons, male or female, who have criminal records without permission from my Parole Officer.
10. I will immediately inform my Parole Officer if I am arrested or charged with any criminal offense.
11. I understand that I must submit to drug/alcohol testing at my expense if paroling offense is substance abuse related.
12. I will not serve as an informant for any law enforcement official without prior consent of my Parole Officer.
13. I will secure the approval of my Parole Officer before I apply for a license to drive an automobile in any jurisdiction where I may reside.
14. I will not own or otherwise have in my possession firearms or weapons of any description.
15. I will not correspond with or visit any inmate of a correctional institution without written consent of my Parole Officer.
16. I will reply promptly to any communication from any authorized representative of the Parole Board. I understand that reports either verbal or written, made or submitted by me to my Parole Officer that are subsequently found to be false may be considered a violation of parole.
17. If I should be arrested in another state during the period of my parole, I will waive extradition and will not resist being returned by the Parole Board to the State of Rhode Island.
18. I will not indulge in the use of narcotics and will abstain from the use of intoxicating beverages; nor will I sell or abet the sale of narcotics in any form. I agree to submit to drug and/or alcohol testing at the request of my Parole Officer.
19. Special Conditions: Parole to his consecutive sentence. Upon release from his consecutive sentence he is to engage in weekly mental health treatment for one year, as well as a psychiatric treatment assessment to determine if he needs medication and other assistance and GPS for thirty days. To extend GPS his parole officer may make a request to the Chairperson. During any period he becomes unemployed, he must document an active employment search and also work with his parole officer to

2. I agree that the Parole Board may revoke this permit at any time unless its expiration date is extended by the Parole Board, if probable cause has taken place, or the right to such preliminary hearing is waived by me and after a revocation hearing is held by the Parole Board.
3. I agree that the violation by the holder of this permit or any of its terms or conditions, or the violation of any laws, after appropriate hearings have been granted, may make void said permit.
4. I agree that when this permit has been revoked as herein provided, or there is probable cause for such revocation, the Parole Board may issue an order authorizing my arrest any my return to the place of confinement pending a hearing, and that I shall be detained therein according to the terms of my original sentence; and in computing the period of my confinement, the time between my release upon said permit and my return to the place of my original confinement shall not be considered as any part of the term of my original sentence.

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8. I will carry out the instructions of my Parole Officer, report as directed, and permit him-her to visit me at my residence and place of employment whenever he-she deems such visits necessary. I will not change residence or employment without first consulting my Parole Officer. If for any reason I lose my employment, I will immediately report this fact to my Parole Officer.
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12. I will not serve as an informant for any law enforcement official without prior consent of my Parole Officer.
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15. I will not correspond with or visit any inmate of a correctional institution without written consent of my Parole Officer.
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18. I will not indulge in the use of narcotics and will abstain from the use of intoxicating beverages; nor will I sell or abet the sale of narcotics in any form. I agree to submit to drug and/or alcohol testing at the request of my Parole Officer.
19. Special Conditions: Parole to his consecutive sentence. Upon release from his consecutive sentence he is to engage in weekly mental health treatment for one year, as well as a psychiatric treatment assessment to determine if he needs medication and other assistance and GPS for thirty days. To extend GPS his parole officer may make a request to the Chairperson. During any period he becomes unemployed, he must document an active employment search and also work with his parole officer to perform up to twenty hours weekly of community service.

In the case of distress or hardship, the holder of this permit will promptly communicate with his Parole Officer, who will seek to protect him-her in his-her rights and aid him-her in his-her needs.

To be released no sooner than DECEMBER 16, 2019.

Victoria M. Almeida
Member of Parole Board

James Chafin
Chairperson

NOTICE

The violation by this holder of this permit or any of its terms or conditions, of the violation of any laws, shall of itself make void said permit. The within permit has been explained to me. I fully understand its terms and conditions and will report to the Parole Counselor as directed.

(Date) 12/19/19

(use black pen)

Witness Amir

Signature of Parolee

*R under
advisement of
counsel
did sign*