

Mitigation Report and Reentry Plan - [REDACTED]
Prepared by the Youth Sentencing & Reentry Project (YSRP)
Submitted to Counsel on [REDACTED]

I. INTRODUCTION

The Youth Sentencing & Reentry Project (YSRP) developed this mitigation report and reentry plan in support of [REDACTED]'s resentencing and parole hearing. We submit this report as a supplement to the advocacy provided by [REDACTED] pro bono attorney, [REDACTED]. Our goal is to provide both the Court and the Pennsylvania Board of Probation and Parole additional background information, evidence of rehabilitation, and an actionable reentry plan, in support of [REDACTED] request that the Court accept the parties' agreement on resentencing to an amended term of 35 years to life. Having already served more than the agreed minimum, [REDACTED] is now also an exceptional candidate for parole. Particularly in the Life History section of this report, we offer additional insights provided by family and community members to supplement and amplify the Court's and Board's understanding of [REDACTED] as a person who is ready to make a new beginning.

YSRP uses direct service and policy advocacy to transform the experiences of children prosecuted in the adult criminal justice system, and to ensure fair and thoughtful resentencing and reentry for individuals who were sentenced to life without parole as children ("juvenile lifers"). We partner with court-involved youth and juvenile lifers, their families, and lawyers to develop holistic, humanizing narratives that mitigate the facts of each case; get cases transferred to the juvenile system or resentenced; and make crucial connections to community resources providing education, healthcare, housing, and employment. We also provide trainings on mitigation and recruit, train and supervise students and other volunteers to assist in this work. Our ultimate goals are to keep children out of adult jails and prisons, and to enhance the quality of representation juvenile lifers receive at resentencing and as they prepare to reenter the community.

Our hope is that after reviewing this report, the Court and the Pennsylvania Board of Probation and Parole ("the Board" and "Parole Board," alternatively), will have a better understanding of [REDACTED]'s background and the kind of person he has become, and have confidence that he will be able to return to the community successfully. This report is submitted with the understanding that [REDACTED]'s release will be dictated by the Board, which may include timelines not anticipated here. Specifically, we understand that if granted parole, [REDACTED] may be released to a Community Corrections Center for a specified period of time. In that instance, the plans detailed here, including the home, educational, and workforce opportunities, would commence upon his release from the Community Corrections Center. YSRP will continue to liaise with [REDACTED], his support network, and his assigned parole agents or supervisors during this transitional time to effectuate the proposed plan detailed here.

II. PROCESS

This report is based on in-person interviews and telephone conversations with [REDACTED] and members of his support network, including his sister, [REDACTED], his daughter, [REDACTED], his paternal aunt, [REDACTED], his fiancée, [REDACTED], his maternal cousins, [REDACTED] and [REDACTED], his maternal aunt, [REDACTED], and his niece, [REDACTED]. Longtime friends [REDACTED], and [REDACTED], and [REDACTED] as well as leaders of nonprofit organizations and agencies detailed in the ensuing sections underscore that [REDACTED] has strong support from his family as well as from the community. In addition, YSRP has reviewed materials provided by [REDACTED]'s longtime attorney, including notes from his interactions with [REDACTED] and his supporters, the homicide file provided by the Philadelphia District Attorney's Office, and the "Juvenile Lifer Packet" provided by the Pennsylvania Department of Corrections. YSRP also has received and includes in the attached Appendix, ten letters of support from members of [REDACTED]'s family and community that attest to his background, growth while incarcerated, and their commitments of continuing support should he be released from prison.²

III. RECOMMENDATION

We urge the Court to accept the agreed upon amended sentence of 35 years to life, and encourage the Parole Board to release [REDACTED] immediately. [REDACTED] has spent the last [REDACTED] years of his life in prison. During that time, he has built an impressive employment history, developing culinary and maintenance skills that he can leverage in obtaining employment upon his reentry into the community. In addition, [REDACTED] has a strong network of family and community support, both within and outside of the prison system. Within the past 16 years in particular, [REDACTED] has matured into a remorseful, self-educated and hopeful man. He is no longer young. Consistent with the perspective of someone who is now middle-aged, he prides himself on being able to react thoughtfully to difficult situations rather than acting impulsively as he did in his younger years.³

Particularly relevant to the Court's and Board's determination in [REDACTED]'s case are United States Supreme Court Justice Anthony Kennedy's closing words in the *Montgomery v. Louisiana*⁴ decision:

² See Appendix, Letters of support from [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], and [REDACTED]. Note that there are two copies of [REDACTED]'s letter -- one in her handwriting and one typed for ease of reading.

³ Interview with [REDACTED] at [REDACTED], October 17, 2016 [hereinafter "Interview with [REDACTED]"].

⁴ *Montgomery v. Louisiana*, 577 U.S. —, 136 S.Ct. 718 (2016). As the Court and the Board are both aware, [REDACTED]'s case comes before the court and the Board as a result of the United States Supreme Court's January 2016 decision in *Montgomery*, which requires resentencing for individuals previously sentenced on a mandatory basis to life in prison without the possibility of parole ("LWOP") for offenses committed when they were under the age of 18 ("JLWOP"). The *Montgomery* decision made retroactive the Supreme Court's earlier decision in *Miller v. Alabama*,

“In light of what this Court has said [...] about how children are constitutionally different from adults in their level of culpability, [...] prisoners like Montgomery must be given the opportunity to show their crime did not reflect irreparable corruption; and, if it did not, their hope for some years of life outside prison walls must be restored.”⁵

Like Mr. Montgomery, ██████████ has spent several decades in prison for a crime committed when he was a teenager. The remorse he expresses, and the rehabilitation he has evidenced, prove that he is not irreparably corrupt, and that he should be given the opportunity for “some years of life outside prison walls.”⁶ Moreover, the reentry plan provided here details the meaningful and supportive opportunities and supports that ██████████ has available to him to facilitate his transition home, and to enable him to contribute in a positive way as a member of his community.

In furtherance of counsel’s advocacy, this report reviews how the Supreme Court’s so-called “*Miller* factors” apply to ██████████’s resentencing, including pertinent aspects of his childhood, the resilience and growth he has shown throughout his time in prison, and the plans put in place should he be allowed the opportunity to live his life beyond institutional walls.

Specifically, the ensuing sections explore significant factors that contributed to ██████████’s susceptibility and vulnerability as a youth to negative behaviors and influences, leading to his involvement in this tragic case. Also pertinent is how ██████████ has committed himself to self-improvement while incarcerated. Moreover, the reentry plan provided in Section VI details the meaningful opportunities and supports that ██████████ has available to him to ease his transition home, and to enable him to contribute in a positive way as a member of his community on the outside. Together, these factors support the agreed upon sentence of 35 years to life, and make ██████████ an exemplary candidate for immediate parole.

IV. LIFE HISTORY

A. Family Structure

██████████ was born on March 15, 1962 to ██████████ and ██████████. ██████████ is one of seven children. The eldest of the ██████████ children, ██████████, died at the age of three following respiratory complications from Pneumonia. ██████████ has two older sisters: ██████████, who passed in February of 2015, and ██████████ who remains a steadfast supporter of her brother. ██████████ also has three younger brothers: ██████████, with whom he remains close, a half maternal brother, ██████████, who was murdered in ██████████, and a half paternal brother, ██████████, with whom he has had limited contact.

⁵67 U.S. —, 132 S.Ct. 2455 (2012), which found mandatory JLWOP sentences unconstitutional. These rulings focus on the growing body of developmental research that demonstrates how children – including those who commit violent crimes – possess a greater capacity for rehabilitation than do adults, and are categorically less culpable for their criminal conduct.

█'s parents, █ (hereinafter "█") were married. They remained together, despite a tumultuous relationship, until █ was approximately 6 years old. Her children describe █ as having been "a gypsy," never staying in one place for long.⁵ As will be detailed in the ensuing sections, █'s childhood was wrought with instability and disruption, moving and changing schools almost yearly. Despite █ presence in his son's life, his involvement was, more often than not, harmful to █. In addition to exposing █ to drug dealing and often putting his life at risk, █ was also called upon by █ to administer corporal punishment to the children at the slightest provocation. Within a year of his parents separating, █ met █ stepfather, █, who is the father to his younger brother, █ (deceased).

Both █ passed away during █ incarceration. According to █, █ died of cancer in █.⁶ She was █ years old. At the end of his life, █ suffered from Alzheimer's, lung disease and liver damage. █ died in at age █.

B. Developmental Years

1. Early Childhood

█ spent the first four years of his life in the █ housing projects in █. During this time, █'s parents suffered the tragic loss of their eldest son, █, who died at the age of three. During this period, █ repeatedly witnessed fighting between his parents, including one time when his mother stabbed his father with a knife. As discussed in ensuing sections, █ was repeatedly exposed to violence beginning at an early age. According to █'s older sister, █, their mother suffered from depression and was prescribed the mood stabilizer █, which she often refused to take, believing instead that "God was her healer."⁷ As will be described in detail below, further instability ensued when █'s parents separated, leaving █ as a single mother of four⁸ children, living in the projects.

The █, once called "█," was created in one of the larger districts slated for rehabilitation by the city's Redevelopment Authority in 1951.⁹ A contemporaneous news article

⁵ Interview with █, █, 2016. See also Interview with █, █, 2017.

⁶ *Id.*

⁷ Interview with █, January 25, 2017.

⁸ Although █ had a total of six children, at the point she separated from her husband, the eldest of her children had died and the youngest was not yet born.

⁹ "█ Get go-Ahead From Wash.," Philadelphia Tribune (1912-2001), Aug 14, 1951, available at: █ http://www.█/?page_id=812. ¹² "Temple University and North Philadelphia; 125 Years of Linked History," available at: <http://www.urbanoasis.org/temple/?q=█>.

described that “[redacted] was developed out of necessity to replace the dilapidated housing that helped eliminate several blocks of slum housing.”¹² The [redacted] were designed to be run as a city program. As with many housing projects at the time, it “was not the idyllic haven that many elites hoped it would be, it instead became a pit of despair and dangerous behavior, residents became scared to report issues, because there was not much the police would do, and it instead would create more issues.”¹⁰ Although it was it created to improve the dilapidated housing that previously existed in the neighborhood, the [redacted] in many ways replicated the same issues that existed in the previous housing and, in fact intensified them. News reports from the time document complaints from residents about the conditions in the [redacted], and the fact that having the city as the landlord complicated the relationship between residents and their effective landlord.¹⁴

2. Multiple Moves and Educational Disruption

[redacted] was primarily raised by his mother in a single parent household moving from address to address on average, once a year. According to [redacted], “We stayed moved. Mom was like a gypsy. We never stayed in one spot.”¹¹ The family lived in poverty and was dependent upon public benefits. [redacted] remembers food being scarce, a lack of heat and frequent rodent infestations in their homes.

Related, [redacted]’s educational experience was marked by disruption and instability; he attended fifteen different schools and lived at fourteen different addresses before his arrest on [redacted].¹² The following list highlights the many moves and school transitions [redacted] experienced during his childhood:

- [redacted]: [redacted] begins Pre-Kindergarten at [redacted] while living at [redacted].
- [redacted]: [redacted] begins Kindergarten at [redacted].
- [redacted]: The family moves to [redacted]. [redacted] transfers to [redacted] School for the first grade.
- [redacted]: The family moves to [redacted] and [redacted] transfers to [redacted] Elementary School, where he remained in the first grade.
- [redacted]: The family moves to [redacted], forcing [redacted] to readjust to a new first grade class at [redacted]. He remains at [redacted] for second grade.
- [redacted]: [redacted]’s mother again moves the family, this time to [redacted], while [redacted] is in the third grade. [redacted] is transferred to yet another new school: [redacted] Elementary.

¹⁰ *Id.*

¹¹ Interview with [redacted], [redacted], 2016.

¹² School District of Philadelphia educational records, received February 6, 2017.

- [REDACTED]: Once again [REDACTED] is uprooted when his mother moves the family to [REDACTED]. He is transferred to [REDACTED] Elementary for the fourth grade. In April [REDACTED], [REDACTED] scores in the one percentile on the Iowa Test of Basic Skills. This means 99% of students at [REDACTED]'s grade level tested higher than he did.
- [REDACTED]: Despite remaining at the family's [REDACTED] address, [REDACTED] is "bussed" to [REDACTED] Elementary. No reason was given for this process in the school records, however his fifth grade teacher notes indicate a request for a psychological evaluation in June [REDACTED].
- [REDACTED]: [REDACTED] transfers to [REDACTED] School for the sixth grade. A psychological evaluation performed on [REDACTED], 1974, by Dr. [REDACTED], indicates an IQ of 67 and notes: "Little awareness of his environmental detail and little understanding of his inadequacies. Even simple routines confuse him."¹³ [REDACTED] is noted to be working at a second grade level and described as working "mechanically without understanding....He would be helped within the framework of retarded-educable classroom."¹⁴
- 1974: [REDACTED]'s mother removes him from the School District of Philadelphia and temporarily enrolls him in the Moorish Science Temple of America without notifying the School District. [REDACTED] recalls thereafter being sent to [REDACTED] School,¹⁵ a residential school providing special education services in [REDACTED], PA. He was approximately 14 years old and remained there, inpatient, for three months. According to [REDACTED], "It was the one place I liked going to school[...as]there were only a couple kids in my class"¹⁶ (indicating a small student/teacher ratio which provided him with the needed assistance to learn). There was no indication in [REDACTED] school records that he ever attended [REDACTED] School.
- [REDACTED]: [REDACTED] returns to the School District and attends [REDACTED] Middle School for the 7th grade. While he was away, the family had moved to [REDACTED].
- [REDACTED]: The instability in [REDACTED]'s life continues as the family once again moves, this time to [REDACTED], and he attends yet another new school for the 8th grade: [REDACTED] Junior High School.
- [REDACTED]: The family moves back to the [REDACTED] address and while still in the 8th grade at age 15, [REDACTED] is transferred to [REDACTED] Junior High School.
- [REDACTED]: Two additional addresses are listed for the [REDACTED] family: [REDACTED] and [REDACTED].¹⁷
- [REDACTED]: [REDACTED] transfers to [REDACTED] Junior High School for the remainder of 9th grade. The family moves to [REDACTED]. Although [REDACTED]'s school records

¹³ *Id.*

¹⁴ *Id.*

¹⁵ See <http://www.cvca-pa.org/overview>.

¹⁶ Interview with [REDACTED], February 14, 2017.

¹⁷ School District of Philadelphia educational records.

do not officially classify him as receiving special education services, there is a reference made to PYDDTC,¹⁸ as well as ██████████ attending special classes at ██████████.¹⁹

██████████ was formerly known as “██████████.”²⁴ ██████████ recalled “taking the bus to the last stop and taking day classes with the children that lived there.”²⁵

- ██████████: ██████████ records indicate enrollment in two high schools in the ██████████ school year: ██████████ High School and ██████████ High School. The family continues to move, residing at ██████████ and then at ██████████.
- ██████████: Despite a note dated ██████████ stating “Drop as mother requested after 17th birthday,” the School District enrolled ██████████ in ██████████ High School. A change in address is once again noted to ██████████. On ██████████ ██████████ is formally dropped from the School District’s roster.

Given his low IQ and the incredible amount of disruption he experienced throughout his youth, ██████████ clearly would have benefitted from additional structure and support from the School District. The family’s constant moving and upheaval never allowed for a teacher or concerned adult to get to know him and identify his needs, let alone attempt to implement a plan of action to assist him with his learning difficulties. He described his fear of being called upon in school; “I would sit at my desk and hope and pray the teacher wouldn’t call on me.”²⁰ Based on his noted IQ score, his inferior percentile ranking in generalized testing and the instability of his home life, the need for special education services was apparent. So, too, was their lack of implementation. ██████████ inability to function within the traditional classroom setting fueled his frustration and led to his sporadic attendance, failing grades and eventually his dropping out of school in the 10th grade.²¹ The constant disruption and instability in ██████████ home life had a direct effect upon his ability focus and learn while in school, as is described further below.

3. Instability at Home and the Neighborhood

a) Poverty and Food Insecurity

Compounding the instability and disruption in ██████████ life created by constantly moving, ██████████ basic needs were rarely met. In addition, ██████████ constant exposure to violence created a perpetual state of anxiety and fear. Having separated from ██████████ father, as referenced above, ██████████ became a single mother. ██████████ relied upon public

¹⁸ Email correspondence on February 8, 2017, between Jill Riddick, School District of Philadelphia, School Records Supervisor and Mitigation Specialist, ██████████, describe that ██████████ once stood for ██████████.

¹⁹ School District of Philadelphia educational records and interview with ██████████.²⁴ “With a New Center Coming, Remembering ██████████,” April 2, 2015, Sarah Kennedy. available at: <http://hiddencityphila.org/2015/04/with-██████████> ²⁵ Interview with ██████████, February 14, 2017.

²⁰ *Id.*

²¹ *Id.*

assistance to provide what little she could for her family. [REDACTED] recalled eating the one meal provided by school as his only meal most days, and going to bed hungry as a nightly occurrence. He added, "I don't remember ever eating while on [REDACTED] Street."²²

Despite being recipients of public benefits, the family's allotments often weren't enough and they often went without heat and had to resort to turning on the oven for warmth.²³ In addition to the lack of heat, [REDACTED] noted that rodents roamed throughout each of his houses.^{24 25}

b) Physical and Emotional Abuse

Both of [REDACTED] parents smoked marijuana on a daily basis, rendering them emotionally unavailable to their children. Their relationship was erratic and highly volatile, often placing the children in risk of danger.

As referenced above, [REDACTED] and [REDACTED] separated in 1970, at which point [REDACTED] moved out from the family's home. Despite [REDACTED] absence from the home, he remained in [REDACTED] life. While he was a male role model, his influence often placed his young son's life at risk. [REDACTED] recalled being aware as early as age five that his father was a drug dealer. He described: "I grew up around marijuana. My father had trash bags full in the basement, yard and garage."³¹ Between the ages of five and twelve, [REDACTED] would fill pencil cases with marijuana and place them in [REDACTED] and his brother [REDACTED] underwear. [REDACTED] would then drive the boys to [REDACTED], knowing that if he were to be pulled over, the police weren't likely to search the children or their undergarments. This happened on multiple occasions. Upon arriving at their destination, the boys were either left alone in the car or, worse, brought into perilous situations that endangered their lives. At the age of 6, [REDACTED], [REDACTED] and their sister [REDACTED] were with their father at an apartment in [REDACTED]. Two men came to the door and pulled guns on [REDACTED]. The children were told to get into the closet. [REDACTED] vividly recalled being terrified.²⁶ He estimated that he and [REDACTED] would accompany their father at least once a month to abandoned high rise buildings and fill multiple car trunks with boxes of drugs. [REDACTED] was ultimately charged and convicted in federal court after having sold cocaine to an undercover federal agent in [REDACTED]. He spent three years at United States Penitentiary [REDACTED]. In addition to his federal charges, [REDACTED] was subsequently arrested on [REDACTED] for Persistent Disorderly Conduct. He was found guilty on [REDACTED] and placed on probation.²⁷

Additionally, during one of the times that [REDACTED] was present in their family's house, [REDACTED] recalled witnessing his mother stab his father with a knife and on another occasion,

²² Interview with [REDACTED], October 17, 2016.

²³ *Id.*

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²⁵ *Id.*

²⁶ *Id.*

²⁷ See [https://ujportal.pacourts.us/DocketSheets/CPReport.ashx?docketNumber=MC-\[REDACTED\]](https://ujportal.pacourts.us/DocketSheets/CPReport.ashx?docketNumber=MC-[REDACTED])

upon opening the door for his father, [REDACTED] threw pots and pans at [REDACTED]'s head. [REDACTED] would often have to let his father in through a window, hoping not to incite his mother.²⁸

In addition to the abuse between [REDACTED] parents, corporal punishment was the chosen form of discipline for the children in the home. [REDACTED] recounted numerous beatings by his father, including one from which he still bears a scar as a result of his father whipping him with the metal buckle end of a leather belt. In addition, he described the way in which his father would pick him up and repeatedly shake him.³⁵ [REDACTED] also beat [REDACTED], using belts and extension cords. According to [REDACTED], "She used to tear [REDACTED] and [REDACTED] up."²⁹

[REDACTED] was approximately nine years old when the family lived on [REDACTED] in the [REDACTED] section of the city. During this time, [REDACTED] took in her niece, [REDACTED]. [REDACTED] revealed that repeatedly over a period of months, his cousin [REDACTED] would awaken him in the middle of the night and lock young [REDACTED] in the bathroom with her, where she molested him and forced him to perform sexual acts.³⁰ This was [REDACTED] first sexual experience.

[REDACTED] was always self-conscious of his learning difficulties as well as his appearance, describing that during his childhood he was repeatedly made fun of. In particular, he recounted, "I was different; my hair would be going in all different directions, I was light skinned and I looked soft" and he spoke more slowly than other youth.³¹ [REDACTED] attributed this ridicule as a source of his youthful aggression. In addition to feeling as if he needed to portray a tough exterior, [REDACTED] also felt compelled to serve as the protector of his siblings.³²

[REDACTED]'s upbringing lacked any sense of security or warmth. In addition to often not having his most basic of needs met, his parents were ill equipped to provide him with the nurturance he needed. Without the appropriate guidance within [REDACTED]'s home, the culture on the streets of Philadelphia became his model for how to live his life.

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²⁹ Interview with [REDACTED], January 25, 2017.

³⁰ Interview with [REDACTED], October 17, 2016.

³¹ Interview with [REDACTED], February 14, 2017.

³² [REDACTED] recounted his having to endure the ridicule and taunting of his peers, being called a "house nigger" on account of his lighter skin-tone. *Id.* See also "The Race Problem," Malcolm X speech with the African Students Association and NAACP Campus Chapter. Michigan State University, January 23, 1963. Available at: <http://ccnmtl.columbia.edu/projects/mmt/mxp/speeches/mxa17.htm><http://ccnmtl.columbia.edu/projects/mmt/mxp/speeches/mxa17.html>.

c) Neighborhood Conditions, Violence & Peer Influence

In addition to the abuse [REDACTED] endured within his home, he also experienced trauma as a result of the conditions outside of it. As a young child, [REDACTED] witnessed his mother being robbed. At the age of five, he was rendered powerless by his fear and recalls the anger he felt from not being able to rescue her from danger.³³ [REDACTED] described the drug-ridden neighborhood of [REDACTED], noting the constant presence of drug dealers on every corner, broken bottles and drug paraphernalia littering the streets. By the time [REDACTED] turned seven, gangs had infiltrated his neighborhood and violence was ever present. On one occasion, young [REDACTED] found himself amidst chaos, witnessing rival gangs overturning cars.³⁴ Later that year, [REDACTED] witnessed the death of a young girl while sitting on his front steps, waiting to go to church. “[REDACTED], I’ll never forget her name,” was hit by a car and left “all twisted up” in front of [REDACTED]. Making matters worse, [REDACTED] bore a strong resemblance to [REDACTED]’s sister [REDACTED]. Traumatizing him further, [REDACTED] did not know who it was until he walked closer, believing he had witnessed the death of his sister.³⁵ By the age of 14, [REDACTED] felt the increased pressure of local gangs trying to recruit him. [REDACTED] attributes a cousin’s involvement as rescuing him from being inducted into that lifestyle. Violence within the family erupted this same year, as [REDACTED] maternal uncle, Randolph Clark, shot and killed his wife.³⁶

One of the most tragic events in [REDACTED] life occurred when he was 15 years old. He and a friend were entering a local store to buy juice when a verbal altercation between [REDACTED] and a security guard escalated. The guard struck [REDACTED] in the head with a black jack. [REDACTED] friend, [REDACTED], jumped the guard and was subsequently shot between 5-6 times mere feet from [REDACTED]. To this day, he feels responsible for his friend’s death.

Having been raised by parents who smoked marijuana on a daily basis and a father who brought him along to execute drug transactions, [REDACTED] himself turned to drugs at approximately age nine. Due to the availability of it within his home and his early exposure to it, [REDACTED] soon learned it’s numbing effects upon his chaotic life. He would continue using marijuana until his incarceration and, as described in detail below, has spent his time incarcerated demonstrating a commitment to sobriety.

As referenced above, [REDACTED] lacked any stability in his life. His only male role models were abusive and engaged in criminal behaviors. On [REDACTED], 1980, 17 year-old [REDACTED] was identified as the person who fired shots at the decedent, [REDACTED], resulting in his death on [REDACTED], 1980. He was found guilty after trial on [REDACTED], 1982, of Murder in the First Degree and Possessing Instruments of Crime. Following a change of counsel and disposition of post-trial motions, he was sentenced to life imprisonment on [REDACTED], 1985. That conviction

³³ Interview with [REDACTED], October 17, 2016.

³⁴ *Id.*

³⁵ *Id.* See also Interview with [REDACTED], January 25, 2017.

³⁶ *Id.* See also [https://uisportal.pacourts.us/DocketSheets/CPReport.ashx?docketNumber=MC-\[REDACTED\]](https://uisportal.pacourts.us/DocketSheets/CPReport.ashx?docketNumber=MC-[REDACTED])

was affirmed on [REDACTED], 1985. The facts describing the tragic events of that day, as revealed at trial, are summarized by counsel for the parties in their respective Resentencing Memoranda.

V. PRISON ADJUSTMENT AND GROWTH

Upon [REDACTED] arrest in [REDACTED] 1981 he was detained at [REDACTED] prison, a Philadelphia county jail for adults. He remained there for almost four years. Following his conviction in [REDACTED] 1982 and sentencing in [REDACTED] 1985 to life without parole, [REDACTED] was transported to the State Correctional Institution at [REDACTED]. [REDACTED] remained at [REDACTED] for the next twelve and a half years. From [REDACTED] 1997 through [REDACTED] 2006, [REDACTED] served his time at SCI [REDACTED]. [REDACTED] was then transferred to SCI [REDACTED] where he remained until he earned a promotional transfer to SCI [REDACTED] in January of 2016, where he remains today.³⁷ He acknowledges that he has had a difficult time coming to terms with the death of [REDACTED]. The time it has taken [REDACTED] to adjust to a life sentence behind bars, and to overcome deep feelings of hopelessness is not unusual. Having been imprisoned since just after his 18th birthday, while struggling with untreated learning disabilities and having been raised without many material resources, [REDACTED] struggled with his new reality. His prison record from his early years of incarceration reflects that. However, despite the young age at which [REDACTED] entered prison and the difficulties he experienced during his incarceration, he has worked toward and attained a significant amount of personal growth.

[REDACTED] has matured greatly during his more than three and a half decades in prison and has committed himself to using his time productively, through working various jobs, through self education and through turning to his faith for guidance. He demonstrates a level of thoughtfulness and insight that belies his low, school-tested IQ score. [REDACTED] can recognize mistakes he has made in his life and can verbalize the lessons he has learned from them.

A. Disciplinary History

With the exception of one disciplinary infraction involving a staff member, [REDACTED] has remained free from any major misconducts or incidents involving violence throughout his three and a half decades of incarceration. Thirteen years ago, [REDACTED] was charged with assault on a staff member. According to [REDACTED], this incident did not involve any physical contact with the officer; it resulted from a refusal on his part to accept an incomplete commissary order to prevent being charged a full fee. In other words, [REDACTED] received his commissary and, upon realizing it was incomplete, refused to accept it. As a result, the officer wrote him up for assault. He was punished with 180 days in disciplinary custody, but shortly thereafter his sanction was reduced and he was removed from the restricted housing unit prior to the completion of the 180 days. Were he to have physically assaulted a DOC staff member, he would likely have spent considerably more time in the hole, lending credence to his claims as to what actually occurred.

³⁷ Pennsylvania Department of Corrections records for [REDACTED].

In the early years of his confinement, [REDACTED] incarceration represented a continuation of the exposure to violence he experienced at home. Still at an impressionable, young age, [REDACTED] was mere feet away from two separate homicides within the walls of [REDACTED], a notoriously dangerous prison. He recalled the bloody battles between other prisoners leaving him feeling vulnerable and susceptible to becoming a victim himself.³⁸ [REDACTED] described being in a hyper alert state for years, in an attempt not to fall prey to older, more aggressive prisoners.³⁹

B. Self-Education While Incarcerated

[REDACTED] notable struggles while in school in Philadelphia impacted his decisions about education once he was incarcerated. He initially decided not to enroll in classes in prison, fearing ridicule for his learning disabilities in a group setting. When [REDACTED] entered prison in 1985, he was reading at the third grade level.⁴⁰ [REDACTED] recalled the moment he decided he was going to learn how to read. He was in the SCI [REDACTED] visiting room with his daughter, [REDACTED], who was seven years old at the time. [REDACTED] was reading her a children's book and would skip over words he was not able to read. While [REDACTED] was only in the first grade, she caught her father omitting words. "It made me feel bad, that my seven-year-old was smarter than me. It forced me to learn."⁴¹

[REDACTED] could not recall a book ever being read to him as a child, nor did anyone ever sit with him to assist him with his homework.⁴² Ample research demonstrates the profound and enduring connections between language development and later reading, as well as its correlation to language acquisition and the fact that later language learning builds on prior acquisition; thus, earlier acquisition propels later learning.⁴³ Despite the absence of academic encouragement throughout [REDACTED] developmental years, he attempted to build his language skills by using less conventional resources to help him expand his vocabulary. For example, while at SCI [REDACTED], [REDACTED] purchased a dictionary and would watch educational television programming. Upon hearing unfamiliar words on television, he would look them up and work to memorize and use them in conversation.⁴⁴ In addition, [REDACTED] participated in and completed two educational programs while at SCI [REDACTED]: Vocabulary Connections & Reading and Writing for Comprehension in May 2000, as well as Vocabulary Connections, Book #4 in July 2000.⁴⁵

³⁸ Interview with [REDACTED], October 17, 2016.

³⁹ *Id.*

⁴⁰ Pennsylvania Department of Corrections records (DC47C Report).

⁴¹ Interview with [REDACTED], February 14, 2017.

⁴² *Id.*

⁴³ David K. Dickinson, Julie A. Griffith, Roberta Michnick Golinkoff, and Kathy Hirsh-Pasek, "How Reading Books Fosters Language Development around the World," *Child Development Research*, vol. 2012, Article ID 602807, 15 pages, 2012. doi:10.1155/2012/602807.

⁴⁴ Interview with [REDACTED], February 14, 2017.

⁴⁵ Interview with [REDACTED], October 17, 2016. *See also* Appendix for copies of the certificates attesting to his completion of these programs.

Due to [REDACTED] rudimentary reading skills, and low aptitude, he has never felt sufficiently prepared to participate in a pre-GED curriculum. He is looking forward, however, to taking steps to further his literacy upon returning to the community.⁴⁶ He recalls enjoying school while attending [REDACTED] School and having benefitted from the individualized attention to learning. As will be described in the reentry section of this report, the [REDACTED] (“[REDACTED]”) has committed to welcoming [REDACTED] into their adult literacy program.⁴⁷ Upon his release, [REDACTED] will perform a proper assessment of his educational needs, identify learning disabilities which may be interfering with his ability to learn and to address them in a small, student-focused environment to better facilitate learning.

C. Programming While Incarcerated

Because of [REDACTED] status as a lifer, he was not eligible to participate in much programming or vocational training for a good portion of his time incarcerated, as participation in most programs have historically been reserved for the men who would ultimately be preparing for their release. He spent much of his time participating in recreational activities and sports leagues within the Department of Corrections, which were open to lifers.⁴⁸ He earned certificates for his participation on basketball and football teams while at SCI [REDACTED].⁴⁹ In addition, [REDACTED] completed the following programs and courses: Critical Thinking for Adults, Citizenship Program, AOD Outpatient Treatment, Violence Prevention High Intensity, Victim Awareness Education, Relationship Workshop, Technology Workshop, Social Etiquette Workshop, and Seeking Safety.⁵⁰

[REDACTED] is eager to continue his education upon being provided the well-deserved opportunity to be released on parole. The options detailed in the ensuing sections on reentry serve as a representative sample of the programs that [REDACTED] will be connected with upon release.

D. Employment

Throughout his time within the Pennsylvania’s Department of Corrections, [REDACTED] has had jobs at every institution to which he has been assigned.⁵¹ He has never received a negative block/work report.⁵² The following list attests to his history of employment within the Department of Corrections:

⁴⁶ *Id.*

⁴⁷ *See* Appendix, [REDACTED] letter of acceptance.

⁴⁸ Interview with [REDACTED], October 17, 2016. *See also* Appendix for copies of the certificates attesting to his completion of these programs.

⁴⁹ *Id.*

⁵⁰ *Id.*

⁵¹ The only exception is SCI [REDACTED], to which he was just transferred this winter. Due to his status as a newcomer at [REDACTED], he awaits a job assignment.

⁵² Pennsylvania Department of Corrections records.

- [REDACTED]; [REDACTED] - Tailor shop, Kitchen worker and Block worker
- 1997-2006; [REDACTED] - Block worker and Maintenance within the Recreation Department
- 2006-2016; [REDACTED] - Kitchen worker and Block worker
- 2016-present; [REDACTED] - [REDACTED] is on a waiting list for employment within [REDACTED].

When [REDACTED] first arrived at [REDACTED] in 1985, he had just turned 23. Despite his youth, and only being classified within the Department of Corrections for a few months, [REDACTED] almost immediately obtained a job within the Correctional Industries (CI) Tailor shop. While employed as a tailor, he made correctional officers' uniforms and hats and was a sewing machine operator. He then worked for a short period of time in the kitchen, prior to obtaining a block worker position on his housing unit. As noted above, [REDACTED] was transferred to SCI [REDACTED] in 1997. He continued employment as a block worker, then obtained a maintenance position within the institution's recreation department. While employed at SCI [REDACTED], he began AOD programming and completed the institution's Citizenship program. When [REDACTED] was transferred to SCI [REDACTED] in 2006, he quickly obtained employment within the kitchen washing pots and pans, then worked again as a Block worker. He then completed his AOD program, received his certificate and graduated from the Violence Prevention, High Intensity Program.⁵³ In 2016, [REDACTED] was granted a promotional transfer to SCI [REDACTED], where he is currently housed. He is attending all of the programs recently made available to the juvenile lifers. As noted above, he has obtained certificates of completion in Relationships, Technology, Social Etiquette, Seeking Safety and Cultural Awareness.⁵⁴

The reentry section below outlines a number of potential employment and workforce training opportunities that are available to [REDACTED] if he is released, and has the opportunity to return to Philadelphia. The options detailed there correspond with the work experience he gained during his incarceration, and are in furtherance of his stated interests and goals.

E. Religion

When [REDACTED] was approximately 11 years old, his mother converted to Islam and enrolled [REDACTED] in the Muhammad University of Islam. He recognizes though, it wasn't until he found himself within the confines of [REDACTED] prison as a young man, that he turned to his faith for refuge and spiritual guidance. He furthered his dedication while in SCI [REDACTED] by attending weekly Jumu'ah services, observing Ramadan and participating in Islamic studies. [REDACTED] considers himself to be a devout Muslim and finds strength and pride in his "learning to be a better person."⁵⁵ As will be described in the reentry section below, [REDACTED] faith will serve as a cornerstone of his plans as he prepares to potentially return to the community.

⁵³ See Appendix for copies of the certificates attesting to his completion of these programs.

⁵⁴ *Id.*

⁵⁵ Phone conversation between [REDACTED] and YSRP Mitigation Specialist, Erin L. Fennell, M.A. on 3/2/17.

As noted below, Rev. Dr. [REDACTED] has vowed to find [REDACTED] a Muslim mentor through our collaboration with the [REDACTED] program.⁵⁶ In addition, [REDACTED], [REDACTED], [REDACTED] cousin, is committed to introducing him to his Masjid's Imam and accompanying him to services.⁵⁷

VI. REENTRY PLAN

As is outlined in greater detail below, [REDACTED] will be utilizing the Pennsylvania Department of Corrections, Community Corrections Center (CCC) 2 for his initial home plan. [REDACTED] will then be assisted by Friends Rehabilitation Program (FRP) and has been accepted into two job training and placement programs, with the Center for Employment Opportunities (CEO) and Impact Services, respectively, and will attend literacy classes through Community Learning Center's (CLC) Support Program. In addition, [REDACTED] will have therapeutic support from Penn Medicine's Hall-Mercer Community Mental Health Center's Trauma Recovery Program and will receive relapse prevention planning and support from Community Education Center (CEC). Each of these resources is described in the ensuing subsections.

A. Home Plan

[REDACTED] has established a solid plan for housing upon release from SCI [REDACTED] that includes a primary course of action as well as a backup plan. His first choice is to reside within the Pennsylvania Department of Corrections Community Corrections Center to utilize the vast array of supports that are in place there for [REDACTED] as a returning citizen.

After spending approximately six months at the CCC, [REDACTED] plans to transition to housing that will be made available to him through the Friends Rehabilitation Program (FRP). For FRP, [REDACTED] will make use of the housing voucher provided by the DOC to reentrants, and during his time at both the CCC and in FRP housing, he will be assisted through FRP's case management services.⁵⁸ FRP is a Quaker values-based affordable housing and social service provider working in the Philadelphia region. Their mission is to transform neighborhoods through community-based economic development, sustainable affordable housing and transitional opportunities for marginalized populations. [REDACTED] will be assisted through FRP's Revive and Restore program, an initiative that trains reentry participants to renovate building units, creating affordable housing for families.⁵⁹ In addition, FRP is prepared to offer therapeutic support/referrals and linkage to community resources designed to promote self-sufficiency. They will also provide opportunities for [REDACTED] to connect with a mentor who will help guide him upon his return to the community.⁶⁰

⁵⁶ Phone conversation between Dr. [REDACTED], [REDACTED], [REDACTED] and YSRP Mitigation Specialist, [REDACTED] on February 28, 2017.

⁵⁷ See Appendix, [REDACTED] letter of support.

⁵⁸ See Appendix, Friends Rehabilitation Program (FRP), letter of acceptance from Shawn Johnson. See also <http://friends-frp.com/revive-and-restore/>.

⁵⁹ *Id.*

⁶⁰ *Id.*

In addition to the reinforcement of the CCC and FRP, [REDACTED] will receive ongoing support from his sister, [REDACTED].⁶¹ [REDACTED] is seeking approval from the Philadelphia Housing Authority to permit her to add her brother's name on her lease agreement with the city. [REDACTED] resides in a three-bedroom home at [REDACTED] in Philadelphia. If granted permission, [REDACTED] would have the comforts of his own room and the ongoing companionship, support and guidance of his sister in her home. He views this as his backup plan currently since [REDACTED] has not yet obtained permission for him to reside with her. As is attested to in her letter of support, [REDACTED] is looking forward to welcoming [REDACTED] into her home.⁶² [REDACTED] has vowed to help her brother in any way possible adding, "I just want him to come home so we can grow old together."⁶³

B. Additional Family and Community Support

1. Family Members

In addition to the support of his sister, [REDACTED], [REDACTED] also has an abundance of other familial and community support, as evidenced by the numerous heartfelt letters included in the Appendix and referenced throughout the ensuing discussion. [REDACTED] has the support of his fiancée, [REDACTED], his paternal aunt, [REDACTED], his cousins, [REDACTED], [REDACTED] and [REDACTED], niece [REDACTED] and longtime friend, [REDACTED]; all of whom are ready, willing and able to welcome [REDACTED] home and provide emotional support as he transitions back into society.⁶⁴

Perhaps most eager to welcome [REDACTED] home is his daughter, [REDACTED]. Only 18 months old when her father was sentenced to life in prison, she anxiously awaits her father's return home so they can continue to build upon their loving relationship. Despite [REDACTED] living in [REDACTED], she travels to Philadelphia often and has vowed to help her father with his transitional needs.⁶⁵

[REDACTED] fiancée, [REDACTED] remains committed to her relationship with [REDACTED], which began in 1995 when they were introduced by a mutual friend. She is employed as a private Nurse's Aide which will enable her to financially assist [REDACTED] as well as give her flexibility with her schedule so that she can ensure quality time with [REDACTED] and help him readjust to

⁶¹ See Appendix, [REDACTED] letter of support. See also Interview with [REDACTED], January 25, 2017.

⁶² *Id.*

⁶³ Conversation between [REDACTED], and YSRP Mitigation Specialist, [REDACTED] outside courtroom 1105 following a status listing for [REDACTED] on December 9, 2016.

⁶⁴ See Appendix, [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] and [REDACTED] letters of support.

⁶⁵ See Appendix, [REDACTED] letter of support.

society. [REDACTED] is looking forward to providing [REDACTED] with home cooked meals and spending long-awaited family time with both [REDACTED] and her grandson.⁶⁶

2. Peer Mentors

[REDACTED] also has the support of long-standing friends, including individuals who themselves have successfully transitioned home from incarceration. [REDACTED] is a close friend and supporter of [REDACTED]—the two grew up together as children and were housed together while at SCI [REDACTED] and again at SCI [REDACTED]. They have known each other for over 45 years.⁶⁷ [REDACTED] is a licensed barber and owns his own barber shop, [REDACTED], located in [REDACTED], VA. He has pledged to assist [REDACTED] in navigating what will be a foreign place to him after 35 years' incarceration.⁶⁸ [REDACTED] has successfully reintegrated himself, has been married for 18 years and understands the obstacles [REDACTED] may encounter. [REDACTED] has remained in contact with [REDACTED], as they talk on the phone weekly, and will reinforce with [REDACTED] the need to be patient with himself upon release.⁶⁹ [REDACTED] travels to Philadelphia often, is looking forward to seeing [REDACTED] and spending time with him. [REDACTED], another friend of [REDACTED], also his daughter's maternal uncle, remains committed to helping [REDACTED] navigate his new surroundings and new life on the outside.⁷⁰ Having spent time in prison and successfully reintegrated themselves into their families and faith, both [REDACTED] and [REDACTED] will play a pivotal role in [REDACTED] healthy adjustment to life on the outside, in that they have themselves experienced the same feelings and challenges he will soon face.⁷¹ Their peer mentorship will be instrumental in supporting [REDACTED] emotional health.⁷²

3. Amachi

YSRP is continuing to build a structure for mentoring with Amachi, a program founded by Dr. [REDACTED], [REDACTED], [REDACTED]. Amachi was developed to provide children of incarcerated parents with a different path by establishing the consistent presence of loving, caring people of faith.⁷³ With input from YSRP, Amachi is working to develop a new program that caters specifically to the needs and circumstances of former juvenile lifers returning to Philadelphia. For [REDACTED] specifically, [REDACTED] is working to identify a mentor suited to [REDACTED] needs prior to his being granted parole in order to ensure that he has abundant

⁶⁶ Conversation between [REDACTED] and YSRP Mitigation Specialist, [REDACTED] on February 17, 2017. *See also* Appendix, [REDACTED] letter of support.

⁶⁷ *See* Appendix, [REDACTED] letter of support.

⁶⁸ *Id.*

⁶⁹ *Id.*

⁷⁰ *Id.*

⁷¹ *See, e.g., id.*

⁷² *See* Elizabeth Marlow et al, *Peer Mentoring for Male Parolees: A CBPR Pilot Study*, 21 May 2014 (describing quantitative findings showing increased success in both short-term reentry and long-term reintegration for returning citizens who have formerly incarcerated peer mentors to support their transition from incarceration).

⁷³ <http://www.amachimentoring.org>

support awaiting his return to the community, which can begin before he makes that transition home.⁷⁴

C. Employment Opportunities

██████████ acknowledges his need for structure upon his return to the community. He has taken the initiative to learn about the programs and supports offered through the Bureau of Community Corrections (BCC) through the Community Corrections Centers (CCC).⁷⁵ ██████████ plans to avail himself of the programming and resources that the BCC has made available to all juvenile lifers.⁷⁶

As described above, throughout his time in Pennsylvania's Department of Corrections, ██████████ has maintained employment. He has never received a negative block/work report. The skills and work ethic he developed through his many positions with the DOC will enable him to transition successfully to full-time employment on the outside. He recognizes, however, that there are critical differences between holding a job within the DOC and on the outside. He is excited to have been connected to workforce development programs that will provide him with important job readiness skills and on the job training opportunities.

The ensuing subsections detail the employment and workforce training opportunities that are already committed and available to ██████████ upon his return to the Philadelphia community. Of particular note is the first option described below, an intensive training and employment program called the Center for Employment Opportunities (CEO), which will provide him with on-the-job training opportunities and guaranteed case management services for up to one year after his start with their program. The following is by no means an exhaustive list, and can be supplemented with additional opportunities.

1. Center for Employment Opportunities

██████████ has been provisionally accepted to participate in the next CEO cohort after he is released on parole.⁷⁷ CEO is a national 501(c)(3) nonprofit organization with a Philadelphia branch that is "dedicated to providing immediate, effective and comprehensive employment services to men and women with recent criminal convictions."⁷⁸ The program includes life-skills education, transitional work, job placement services and post-placement retention services. CEO's effective, evidence-based model is highly structured and tightly supervised to "help participants regain the skills and confidence needed for successful transitions to stable, productive lives."⁷⁹

⁷⁴ Conversation between ██████████ and YSRP Mitigation Specialist, ██████████ on February 28, 2017.

⁷⁵ Interviews with ██████████ on October 17, 2016 and February 14, 2017.

⁷⁶ *Id.*

⁷⁷ See Appendix, Center for Employment Opportunities (CEO), letter of acceptance from Hillary Facchine.

⁷⁸ <https://ceoworks.org/about/what-we-do/mission-vision/>.

⁷⁹ *Id.*

The attached letter from Hillary Facchine, one of CEO’s Job Coaches and Life Skills Educators, attests to the fact that CEO has made available a position for ██████████ in their program.⁸⁰ As Hillary’s letter describes, CEO’s program will enable ██████████ to begin working and receiving a paycheck immediately, while simultaneously receiving on-the-job training and interviewing skills. CEO is a well-established program with “sites in 11 cities across four states, serving 4,500 formerly incarcerated men and women annually.”⁸¹ CEO currently operates “more than 70 transitional work crews across its sites, providing maintenance and labor services to a wide range of public sector infrastructure agencies.”⁸² The organization works “exclusively with individuals coming back from incarceration, including individuals deemed ‘higher risk’”⁸³ and their evidence-based model “reduces the likelihood of re-incarceration and helps participants build a foundation for a stable, productive life for themselves and their families.”⁸⁴

Upon ██████████ being granted parole and being assigned a parole agent, YSRP will facilitate the formal referral necessary to enable him to begin the program. Immediately following this referral, ██████████ will begin a four-day orientation that covers resume-building, computer skills, online job applications, internet safety, interview skills and goal-setting. Next is CEO’s Life Skills Education class, which, upon completion, will result in ██████████ immediately being hired for a temporary transitional job. Participants in the Philadelphia CEO program work through the City’s Parks and Recreation Department and earn \$12/hour. ██████████ will be able to work on a crew up to four days a week. On ██████████ days off he will be expected to work with a job coach or job developer to get him ready for more permanent employment and subsequently match him with a permanent, full time (20+ hours/week) job. ██████████ will be followed on a regular basis with intensive post-placement support throughout his first 365 days of employment to provide support as he navigates his first year of work.

2. Impact Services Corporation

As a supplement to the services he will receive by being part of CEO, ██████████ can also take advantage of the resources and supports provided by Impact Services Corporation (hereinafter “Impact”), which has agreed to assist ██████████ with reintegrating into his community and Philadelphia’s workforce.⁸⁵ Impact is a multi-service agency that has been serving returning citizens since 1974. The program Impact offers can supplement the employment training and comprehensive case management provided by CEO. Since ██████████ will be released under the supervision of the Pennsylvania Board of Probation and Parole, he will be eligible to receive Transitional Offender Workforce Development (TOWD) services through Impact. Additionally, as Impact manages the Pennsylvania CareerLink, being connected to Impact will ensure that ██████████ is registered and receives all services offered through the CareerLink program as well (described below).

⁸⁰ See Appendix, Hillary Facchine letter of acceptance.

⁸¹ See <https://ceoworks.org/model/>.

⁸² *Id.*

⁸³ See Appendix, Hillary Facchine letter of acceptance.

⁸⁴ See <https://ceoworks.org/about/what-we-do/>.

⁸⁵ Appendix, Impact Services Corporation, letter of provisional acceptance from Jason Cosley.

3. Pennsylvania CareerLink Philadelphia

CareerLink is a national organization that has four career centers in Philadelphia.⁸⁶ CareerLink offers free employment services to job seekers with a “one-stop” framework, including “personalized job search assistance, specialized job seeker workshops, networking groups, career counseling, skills and interest assessments, access to skills and occupational training, extensive job lead resources and more.”⁸⁷ Specific workshops such as “Modern Interviewing,” “Computers for Beginners,” “Online Job Search” and “Do’s and Don’ts of Resumes,”⁸⁸ are available to and will help support ██████████ through his employment search upon his return to Philadelphia and his completion of CEO’s program. YSRP will coordinate efforts with Impact Services in connecting ██████████ to CareerLink in advance of his release date.

D. Counseling and Treatment

1. Penn Medicine / Hall-Mercer

YSRP has made a referral to Hall-Mercer Community Mental Health Center on behalf of ██████████, and he can begin counseling and treatment there as soon as possible, upon his return to Philadelphia.⁸⁹ The clinicians at Hall-Mercer will work with ██████████ to address any trauma related to his incarceration, as well as the other challenges he experienced prior to his arrest. As the first outpatient community mental health center in Pennsylvania, Hall-Mercer distinguishes itself from other community based services through its affiliation with Pennsylvania Hospital and Penn Medicine. This special relationship offers immediate access to a wide range of behavioral health programs and some of the area’s most recognized clinicians. It is the only program of its kind connected directly to a teaching hospital in Philadelphia, which facilitates access to a comprehensive spectrum of clinically renowned behavioral health and medical services.⁹⁰

Specifically, ██████████ can access services through Hall-Mercer’s Penn Center for Youth and Family Trauma Response and Recovery Program (“The Center”), which has pledged support for juvenile lifers returning to Philadelphia.⁹¹ The Center provides a range of interventions and treatment to individuals who suffer from symptoms of traumatic stress and other difficulties after exposure to violence, crime and abuse. It assists individuals and families in coping with many of the related issues that frequently occur in the aftermath of traumatic events. By receiving

⁸⁶ See <http://www.philaworks.org/career-link/home>.

⁸⁷ *Id.*

⁸⁸ *Id.*

⁸⁹ See Appendix, Penn Medicine / Hall-Mercer provisional letter of acceptance for treatment by Lauren Pilar Cliggitt, LCSW.

⁹⁰ See <http://www.med.upenn.edu/hallmercer/>.

⁹¹ Conversations between YSRP Co-Directors and Coordinator of Child Services, Ms. Lauren Cliggitt, MSW, LCSW. Ms. Cliggitt has become an active participant in the Juvenile Life Without Parole Working Group as part of the Citywide Reentry Coalition, which has been convened and is facilitated by YSRP.

therapeutic supports to address the challenges he has faced, [REDACTED] will be better positioned to achieve his goals of obtaining employment and maintaining healthy relationships with family and other supporters upon his return to the community. Importantly, Hall-Mercer works not only with individuals but also with families, so will be able to offer support to Sheila, Fatima and Valarie as they welcome [REDACTED] home and work to reintegrate him into their family. Hall Mercer accepts Medical Assistance, which the Department of Corrections has attested to setting up for juvenile lifers like [REDACTED] prior to their release.⁹²

2. Community Education Centers, Inc.

In addition to the counseling services to be offered through Hall-Mercer, the Community Education Centers, Inc. (CEC), a licensed drug and alcohol facility, has agreed to assess [REDACTED] recovery needs upon his release.⁹³ CEC offers a comprehensive outpatient program that includes wraparound services to assist with vocational, housing, employment and health needs.⁹⁴ Having a history of drug use in his youth, CEC will assess [REDACTED] level of need and if warranted, help him develop a relapse prevention plan, healthy coping skills and a recovery support network within his community.

E. Educational Resources

The Community Learning Center (CLC) is committed to helping adults develop literacy, math and life skills using a supportive and holistic approach, so individuals can realize their fullest potential at home, in the workplace and in the community.⁹⁵ As referenced in CLC's letter of acceptance provided by CLC's Executive Director Carrie Kitchen-Santiago, [REDACTED] would benefit from the Center's Student Support Program (SSP).⁹⁶ Through SSP, he will receive essential support within classes and tutoring groups; support that was not provided to him throughout his developmental years. In addition to furthering [REDACTED] literacy skills, CLC offers career coaching, job readiness instruction and digital and financial literacy workshops. Staff will meet with [REDACTED] on an individual basis and, if needed, refer him to ancillary social services agencies.

VII. CONCLUSION

The support of his loving and stable family, combined with the growth he has experienced during his 36 years of incarceration and the programs that are ready and willing to support him in the community, make [REDACTED] an excellent candidate for resentencing and immediate parole. He

⁹² Presentation by the Department of Corrections to the Juvenile Life Without Parole Working Group as part of the Citywide Reentry Coalition.

⁹³ See Appendix, Community Education Centers, Inc. provisional letter of acceptance for treatment by Monique D. Hendricks, Director of Reentry-Eastern Division.

⁹⁴ See <http://www.cecintl.com/reentry/residential-reentry-locations/erie-outpatient-philadelphia/>.

⁹⁵ See <http://www.communitylearningcenter.org/content/programs.shtml>.

⁹⁶ See Appendix, Community Learning Center letter of acceptance by Carrie Kitchen-Santiago, Executive Director.

expresses sincere and heartfelt remorse for the tragic loss of [REDACTED] life. If given the opportunity to rejoin his family, [REDACTED] is well-positioned to serve as a positive and contributing member of the community.

[REDACTED] childhood was marked by extreme instability and the absence of any positive male role models. [REDACTED] has spent the last 36 plus years striving to educate and better himself to the best of his abilities. He has maintained employment, developed job skills, kept active through sports and recreational activities and has atoned for his crime through his devotion to his faith.

We hope that the Court and later the Parole Board will consider this submission favorably, and that YSRP will have the opportunity to provide [REDACTED] with ongoing support upon his release. If there is any additional information that might be helpful, we would be happy to provide it.

Submitted by:

Erin L. Fennell, M.A., Lauren Fine, Esq., and Joanna Visser Adjoian, Esq. Youth Sentencing & Reentry Project

March 27, 2017

APPENDIX A List of Documents

Date	Achievement / Certificate
5/10/00	Vocabulary Connections & Reading and Writing for Comprehension Certificate of Completion
6/1/00	Critical Thinking for Adults Certificate of Completion
7/26/00	Vocabulary Connections, Book #4 Certificate of Completion
9/2/00	Commonwealth of Pennsylvania Department of Corrections 2000 Summer League Basketball Tournament Participation Certificate (SCI Smithfield)
10/31/02	Commonwealth of Pennsylvania Department of Corrections C-League Flag Football Certificate of Participation (SCI Smithfield)
2/21/04	Commonwealth of Pennsylvania Department of Corrections B-League Basketball Certificate of Participation (SCI Smithfield)
9/23/04	Commonwealth of Pennsylvania Department of Corrections C-League Summer Basketball Certificate of Participation (SCI Smithfield)
8/1/05	Commonwealth of Pennsylvania Department of Corrections C-League Basketball Certificate of Participation (SCI Smithfield)
12/23/05	Citizenship Program Certificate of Completion
6/4/07	AOD Outpatient Treatment Certificate of Completion
6/9/11	Violence Prevention High Intensity Program Completion (noted on attached DC-43 Integrated Correctional Plan)
8/9/16	Victim Awareness Education Class (PA 143 Class Completion Certification)
9/20/16	Juvenile Lifer Relationship Workshop Certificate of Completion
10/6/16	Juvenile Lifer Technology Workshop Certificate of Completion
11/15/16	Juvenile Lifer Social Etiquette Workshop Certificate of Completion
11/30/16	Juvenile Lifer Seeking Safety Certificate of Completion
1/3/17	Juvenile Lifer Cultural Awareness Certificate of Completion

Certificate of Completion

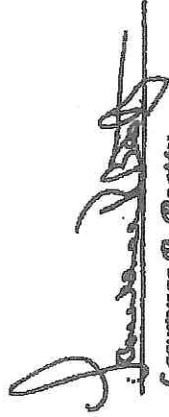
Presented to



for completion of

Vocabulary Connections & Reading and Writing For Comprehension

Given This 10th Day of May, 2000


Lawrence R. Beatty
Academic Counselor


Christopher Stale
Tutor

Certificate of Completion


Presented to:




for completion of

Critical Thinking For Adults

Given This 1st Day of June, 2000


Lawrence R. Beatty
Academic Counselor


Christopher Slade
Tutor

Certificate of Completion

Presented to:




for completion of

Vocabulary Connections, Book #4

Given This 26th Day of July, 2000


Lawrence R. Beatty
Academic Counselor


Christopher Slade
Tutor

Commonwealth of Pennsylvania



Department of Corrections

State Correctional Institution at Smithfield

This is to certify that _____ participated

in the 2000 SUMMER LEAGUE BASKETBALL TOURN. and placed

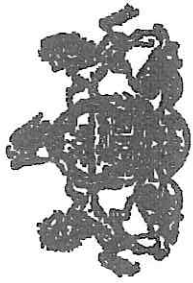
First in the event. Congratulations.

SEPTEMBER 2, 2000

Date


Ronald W. Meyer
Activities Manager
Superintendent

Commonwealth of Pennsylvania



Department of Corrections

State Correctional Institution at Smithfield

This is to certify that _____ participated

in the _____ C-LEAGUE FLAG FOOTBALL _____ and placed

Runner-up in the event. Congratulations.

10/31/02
Date

Paul J. Hunt
Activities Manager

D. Van
Superintendent

Commonwealth of Massachusetts



Department of Corrections



State Correctional Institution at Smithfield

This is to certify that _____ participated

in the _____ E-LEAGUE BASKETBALL _____ and placed

First in the event. Congratulations.

2/21/04
Date


Activities Manager

Superintendent

Commonwealth of Pennsylvania



Department of Corrections

State Correctional Institution at Smithfield

This is to certify that _____ participated

in the _____ C-LEAGUE SUMMER BASKETBALL _____ and placed

First in the event. Congratulations.

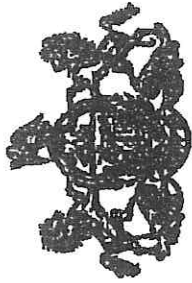
SEPTEMBER 23, 2004

Date

Activities Manager

Superintendent

Commonwealth of Pennsylvania



Department of Corrections

State Correctional Institution at Smithfield

This is to certify that _____ participated

in the C LEA. B BALL and placed

Runner-up in the event. Congratulations.

8-1-05

Date


Activities Manager


Superintendent

This is to certify that



has successfully completed the

CITIZENSHIP PROGRAM

held at the

State Correctional Institution at Smithfield

December 23, 2005

Date

A handwritten signature in black ink, appearing to read 'FRS'.

F. R. Noyes, Unit Manager

SCI Fayette Presents
Certificate Of Completion

TO



AOD OUTPATIENT TREATMENT

JUNE 4, 2007

Tom Maines
Tom Maines DATSII



Pennsylvania Department of Corrections

DC-43 Integrated Correctional Plan

Production

02/23/2017 10:26:55 AM

Inmate Name: [Redacted]

Inmate Number: [Redacted]

Location: A-A-1022-01

Counselor: Idocavage

Annual Review Date: 2/2018

Program Plan	Recommended	Recommended By	Refuses to Participate	Unavailable for Placement
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Currently Enrolled In Programs	Facilitator	Start Date	End Date
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Previously Enrolled In Programs	Evaluated By	Completion	Status
---------------------------------	--------------	------------	--------

Citizenship	Lattimer	Completed	12/23/2005
Group Counseling	Anderson	Failed To Complete	04/15/2004
Outpatient	Maines	Completed	05/04/2007
Substance Prevention High Intensity	Rhodes	Completed	05/09/2011

General Expectations	Recommended	Comment
Maintain positive work reports	02/23/2017	
Maintain Good Behavior	02/19/2003	No Misconducts this Review.
Maintain Housing Reports	02/19/2003	Average reports this Review.
Secure Birth Certificate	02/23/2017	On File.
Secure PennDOT Photo ID	02/23/2017	
Secure SSN Card or Duplicate	02/23/2017	On File.
Additional Education	02/23/2017	

Optional Programs	Recommended	Recommended By	Refuses to Participate	Unavailable for Placement
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Currently Enrolled In Optional Programs	Facilitator	Start Date	End Date
-----------------------------------------	-------------	------------	----------

Previously Enrolled In Optional Programs	Evaluated By	Completion	Status
------------------------------------------	--------------	------------	--------

Seeking Safety(Males)	Smith	Completed	11/30/2016
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Comments:
amended VA Act 143 on 8-5-2016.

I understand that completing the Correctional Program Plan may increase, but not guarantee, my chance of paroling on my minimum sentence. I also understand that if I have been sentenced to a recidivism risk reduction incentive sentence, completing my Correctional Program Plan is one of many conditions for receiving reduction of my minimum sentence.

90
Counselor's Signature/Date
2/23/17

X
Inmate's Signature/Date

PA 143 VICTIM AWARENESS EDUCATION
CLASS CONTRACT

Inmate Name

Number:

Block: AA #6

Institution: SCI Frackville

Instructor: Mr. Cutler

Start Date for Class: 1 August 2016

Class Location: ED Bldg.

Class Schedule: 1 Aug. 2016 through 5 Aug. 2016 Time: 0800 to 1000

Inmate Participation:

As a participant in the Victim Awareness Education Class, I agree to abide by the following rules of conduct of this class and understand that the teacher may remove me from class for any action deemed inappropriate or disruptive.

1. Students will be allowed no absences from the class except for a medical lay in. In case of a medical lay in, if the lay in results in missing more than two days of classes, the student will not be permitted to complete this class and will be required to make up the entire class at another time.
2. The student is responsible to arrange their schedules appropriately so as not to experience conflicts of schedule in attending this class. This includes, but not limited to visits and commissary.
3. Students will not disrespect the views of other students and will not use inappropriate classroom behavior. Participation is encouraged in each of the classes.
4. Students must arrive to the class on time. Failure to do so will result in marked absent, as well as possible dismissal from the class.
5. Students who receive any misconducts while enrolled in the class will be dismissed from the class and not credited with completing the class.

Inmate's Signature: _____

Date: 1 August 2016

COMPLETED COURSE

Teacher's Signature

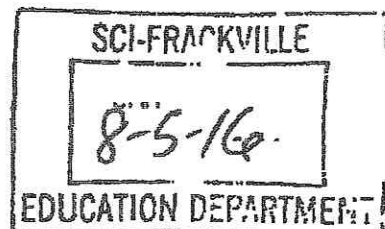
Date: 8-5-16

DID NOT COMPLETE COURSE

Teacher's Signature: _____

Date: _____

Copies: DC-14, DC-15, Education Files

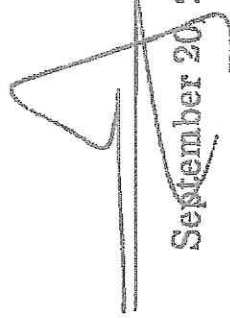


Certificate of Completion

this certificate is awarded to:



for completion of Juvenile Lifer Relationship Workshop


September 20 2016

SCI Frackville/Ms. Smith

1234567890

Certificate of Completion

this certificate is awarded to:



for completion of Juvenile Lifer Technology Workshop

A handwritten signature in black ink, appearing to be 'A. Smith', written over a horizontal line.

October 6, 2016

SCI Frackville/Ms. Smith

12/20/2016

Certificate of Completion

this certificate is awarded to:



for completion of Juvenile Lifer Social Etiquette Workshop



November 15, 2018

SCI Frackville/Ms. Smith

Certificate of Completion

this certificate is awarded to:



for completion of Juvenile Lifer Seeking Safety

A handwritten signature in black ink, appearing to be 'A. Smith', written over a horizontal line.

November 30, 2016

SCI Frackville/Ms. Smith

12-2011-12125

Certificate of Completion

this certificate is awarded to:



for completion of Juvenile Lifer Cultural Awareness

16wJ

January 3, 2017

SCI Frackville/Ms. Goodman

12-2017-01-03

THE FOLLOWING IS A TRANSCRIBED VERSION OF [REDACTED]'S
LETTER OF SUPPORT

To Whom it May Concern,

My name is [REDACTED]. I am writing this letter in support of my older brother, [REDACTED]. I cherish all my memories from childhood with my brother. He was always there for me as my protector. We went [through hard times] as a family, but our love kept us together.

Even though [REDACTED] went to prison at a young age, he remained my strongest supporter. Even through my trial and tribulations, in spite of what he was going through himself, he always kept my spirits up and encouraged me to be strong!

Although my father loved us, he wasn't the best role model for [REDACTED]. [REDACTED] grew up on his own in prison, becoming the responsible man he is today.

I am in the process of speaking with my Section-8 representative in hopes of adding [REDACTED]'s name to my lease. I would love for him to be able to live with me after staying at the CCC, so that we can continue to support each other!

I can't wait to cook meals for him, show him around the city and give him a place to relax and feel safe. He has a large and loving family waiting for him to come home.

I love my brother and have waited and prayed for the past 36+ years for this opportunity. Please grant him immediate parole so he and I can live out the rest of our lives together. I will help my brother with anything he needs.

Sincerely,

[REDACTED]
March 6, 2017

[REDACTED] Philadelphia, PA 19134
[REDACTED]
[REDACTED]

To Whom It May Concern

My Name Is [REDACTED]

I'm writing this letter in support of my
Older Brother [REDACTED]. I cherish all
my memories from childhood with my brother
he was always there for me as my father
we went as a family, but our love kept us
together.

Even know Alfonso went to prison at a young
age, he remain my strongest support. Even
through my trials and tribulations in sports
the struggle he was going through himself he
always kept my spirits up and encourage me to stay
strong!

Although my father loves us, he was the
best role model for Alfonso. [REDACTED] grew
up on his own in prison becoming the responsible
the man he is today.

I am in the process of speaking with my
Section Representative in hopes of adding [REDACTED]
name to my lease. I would love for him to
be able to live with me and stay at the CC
that we can continue to support each other!

I can't wait to Cook meals for him,
show him around the city and give he a place
to relax and feel safe, he has a large loving
family waiting for him to come home!

I love my brother and have waited and
prayed for the past 20 years for opportunity.

Please grant him immediate parole so he and
I can live out the rest of lives together
will help my Brother with anything he needs.

Sincerely,

[REDACTED]
3-6-17

[REDACTED] Phila PA 1/19/34
[REDACTED]

March 8, 2017

Re: [REDACTED] Juvenile Lifer resentencing

To whom it may concern:

I am writing to you on behalf my cousin, [REDACTED], whom I miss very dearly. [REDACTED] has overcome many obstacles in his life and has become a stronger man as a result. I am committed to helping [REDACTED] in every way I possibly can. I myself needed to change my life around so that I could become a positive citizen in society. I too served time in prison and overcame struggles in order to change the course of my life. I have been fully employed and working for the last twenty-five years and will assist [REDACTED] in doing the same. I will do everything I can to help him become a responsible member of our community. I know it will be hard for him but I am certain and committed to helping him the best I can.

I am a devout Muslim as I know my cousin [REDACTED] is. I will bring my dear cousin with me to services and prayer and share with him the support bestowed upon me by my Islamic community.

Please give [REDACTED] the chance to turn his life around and make a new life for himself with the support of his family around him.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

March 8, 2017

Judge Streeter-Lewis
Criminal Justice Center

PA Board of Probation & Parole
Harrisburg, PA

Re: [REDACTED]

Dear Judge Streeter-Lewis and Members of the PA Board of Probation & Parole,

[REDACTED] is my father. I was one-year-old when he was sentenced to life in prison. I am now 37 years old. Despite his being incarcerated, we have a very close relationship. He has always been a constant figure in my life, never wavering. My family always made sure I was taken to visit him and we spent many hours together as father and daughter. All way up until the age of 14, I would see him every Saturday. He would sit me on his knee in the visiting room and read stories to me. This may seem small on the scale of things, but they are memories of him that I carry with me to this day.

I know him to be caring and loving. He has always encouraged me to have confidence in myself and helped me become the strong woman I am today. I joined the Air Force in 2001 and was a member of the Security Forces (Military Police) until 2005 when I was honorably discharged. Prior to joining the Air Force, I completed three years of study within Delaware State University's School of Social Work.

We talk almost every day on the phone but I've always yearned for more. As child and to this day I've always prayed for his freedom. Despite knowing he loves me, I felt a void. He was the best father he could be given his situation. However, I was left wishing he was physically there; at dance performances, trumpet recitals, graduations, proms, and through the loss of loved ones. Now my prayers have been answered and he has the opportunity to come home to share the rest of my memories with me in person.

As you can see from my above addresses, I now live in Los Angeles, however, routinely travel back to Philadelphia. I will do anything and everything to help my father's transition even if it means permanently moving back to Philadelphia. I can help him emotionally and financially and cannot wait to

spend hours upon hours with him, without having to hear that our visiting time has ended. Please let my father come home.

Thank you for your time and consideration of granting my father immediate parole.

Sincerely,

A large black rectangular redaction box covering the signature area.

~ [REDACTED] ~

February 21, 2017

Honorable Judge Streeter-Lewis
PA Board of Probation and Parole

Re: [REDACTED]
State ID#: [REDACTED]

Dear Judge Streeter-Lewis and Members of the Pa Board of Probation and Parole,

My name is [REDACTED]. I am a mother of three children and a grandmother of four. I met [REDACTED] in August 1995, through a close mutual friend. Over the years our friendship has grown into a solid relationship as we are now engaged to be married. I visit him as often as I can and we talk on the phone daily.

[REDACTED] is a kindhearted, compassionate, emotionally strong person. He loves his family and he's always looking out for my well-being. As his wife I will always support him, both emotionally and financially. I am steadily employed and have been a health care aide for the elderly for the past four years.

As you are aware, [REDACTED] has been incarcerated since he was 17 and has spent over 36 years of his life in prison. I know he will be facing a great challenge, transitioning back into the community and I vow to help him find his way.

I pray to the good Lord that you grant him immediate parole, so that he may come home to spend time not only with me, but with my children and grandchildren. We look forward to spending as much time as possible with him and welcoming him into our family. If you have any further questions, please feel free to call me at [REDACTED]. Thank you in advance for your time and consideration of this life changing opportunity for [REDACTED].

Sincerely,

[REDACTED]

[REDACTED]
Philadelphia, Pa. 19104
[REDACTED]

[REDACTED] Esq.
[REDACTED]

August 17, 2016



Hello [REDACTED]

You asked awhile back if I would write about [REDACTED] how he was as a child, his temperament, etc., which I was absolutely willing to do! When it came right down to it though, I realized it wasn't something I could do as I didn't see that much of [REDACTED] as a child. His father (who was my brother) would bring him by every so often, we'd spend some time together, and I wouldn't see him again until the next time his father brought him by.

When he became a teenager and able to get about on his own, I saw very little of him, as his time was now spent with his friends.

It was only after being convicted of a crime he didn't commit, that [REDACTED] & I became close.

Initially because there'd been no contact to speak of, his calls were infrequent. He continued to call however, and as we became more & more comfortable with each other the calls increased.

Today, some 25+ years later, [REDACTED] & I couldn't be closer if he were my son! While I don't get to see him often, I've taken care of him this entire time. From sending him money once a month, to purchasing the large outside food orders that inmates are allowed to have.

...also some years ago, inmates could get outside clothing orders. At that time I saw to it that [REDACTED] had heavy winter jackets, flannel shirts, sweaters, underwear, good sneakers, etc. The same applied to summer clothes - all of which example how I feel about [REDACTED] how close we are.

I wish you could know how much [REDACTED] has grown. How I've watched him *mature* through the years, keeping any complaints he may have to a minimum so as not to worry me.

All he ever talks about is how he can't wait to get home so he can take care of me.

He's so good [REDACTED]

...and though (as I said) I don't get to see him often, we talk a lot on the phone, and I have countless letters from him.

Still we're at this point now, and I thank God for the ruling that has given my nephew a chance to come home.

...and I thank you [REDACTED] for the work you're doing to accomplish this. You've really been there for [REDACTED] helping him over some really rough spots. We both appreciate it so so much!

...and we are both now hopeful that he can finally step out into the light we've always looked to at the end of the tunnel.

...again, we have you to thank for that.

The one wish I've had in all these years was to be able to sit across from [REDACTED] at my kitchen table, and enjoy a home cooked meal together.

If the Source is with me, that day may not be too far off.

Sincerely,

[REDACTED]

[REDACTED]
Philadelphia, PA 19150

February 24, 2017

Judge Streeter-Lewis
Criminal Justice Center
Philadelphia, PA

PA Department of Probation + Parole
Harrisburg, PA

Re: [REDACTED]
State ID#: [REDACTED]

Dear Judge Streeter-Lewis and Members of the PA Parole Board:

My name is [REDACTED] I was raised in the household with my little cousin [REDACTED] [REDACTED] is the daughter of [REDACTED] I have always considered [REDACTED] affectionately known as Pos in our family, as my uncle. I can remember going to visit uncle Pos in jail as a child. I can recall the letters, cards, handmade gifts and numerous phone calls to my grandmother's house from my uncle.

My uncle has spent his entire youth and adult years behind bars. Although we always prayed for the day I never imagined him actually coming home. But I have had many conversations with my cousin Fatima, with her describing how different her life would be if her daddy was home. I would just listen and support her dreams. And now, in a few short months, that dream can be a reality.

[REDACTED] is more like my sister than a cousin as we were raised together. I can't wait for the day uncle Pos comes home to fill the missing piece in our family. We have so much to show him. So much missed time to catch up on. So many things we on the outside take for granted, that we want to share with

him. The simple things like going out to dinner, catching a movie and coming together for our family reunions.

In addition, [REDACTED] and I are dance teachers for youths. I am the owner of [REDACTED] [REDACTED]. My uncle has never been to recital or seen either of us perform. We both attended dance school and have been dancing since we were children. I say all this to point out that Uncle Pos is about to be a "Dance Dad". Long rehearsals, car-pooling, volunteering backstage, and pockets full of sequin are in his near future. We couldn't be happier to help keep him busy and engaged in our lives. I am also on the praise team of my church.

My husband and I are members of the Enon Tabernacle Baptist church in Philadelphia. Like Uncle Pos, my husband was once a practicing Muslim when I met him. He too made mistakes early in life. A few years ago, he joined my church and was baptized by my pastor. I know my uncle's faith is important to him and our church's doors are open if this is something he wants to pursue. He can join us and we can pray as a family every Sunday. There is also a prison ministry that will be accessible to Uncle Pos, to help him with readjusting to his new life. I will introduce him to the Deacon that runs it.

Awaiting the day

[REDACTED]

[REDACTED]

In the name of Allah, the Most Gracious, the Most Merciful

2/8/2017

From: [REDACTED]

Re: [REDACTED]

To whom it may concern:

I send this letter in support of my dear cousin, [REDACTED] who it is hoped will be granted immediate parole and released in the coming months. I will gladly lend my support in helping him re-establish himself and transition back into society and will assist him in any way that I am able.

I know firsthand what he will face upon his return to society, as I myself, served over thirteen years in state prison. I have been a successful returning citizen for the last eleven years. It will be very challenging for him indeed, but with the aid of Allah first and foremost, and then the assistance of those who genuinely care about his well-being, he can get through the many hurdles that he will face. We share the same faith and I commit to helping [REDACTED] find a congregation willing to invite him in and stand by his side.

I send this letter in support of my cousin whom I love and miss dearly.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED] Avenue
Philadelphia, PA 19134
[REDACTED]

March 6, 2017

Re: [REDACTED]

My name is [REDACTED]. I am the niece of [REDACTED]. Although my uncle is incarcerated, he has played a major role in my life as well as my children's. Both my son and daughter love talking with him on the phone. My daughter, I-Jay is two years old and draws pictures of the two of them playing together all the time. She asks every other day, "Is he home yet?" In addition, my uncle has been a mentor to my 14 year old son, Rahim.

I prayed one day my uncle would be set free. I have been visiting him since I was 1 year old. Our visits have always been so special to me. Even though we talk on the phone everyday, we have so much catching up to do. He's such a positive role model in our lives, and gives great advice. He has always had encouraging words for me, assuring me of my worth, and demanding I never settle for anything less. He has taught me it's never too late to start anew and because of him, I now believe I can accomplish anything.

My uncle [REDACTED] is a loving, caring and sweet person and has the biggest heart of anyone I know. I can't wait to see what the future brings. We have plans to start a business together and are going to open a hair salon. Our family is ready, willing and able to welcome him home and give him all the love and support he will need in his transition. I plan on giving him a surprise party when he comes home.

If you have any questions or concerns, please contact me so I can assure you my uncle will be well taken care of, loved and supported.

Sincerely,

[REDACTED]
[REDACTED]

[REDACTED]



February 21, 2017

Dear Judge Streeter-Lewis and Members of the Pennsylvania Board of Probation & Parole,

I am writing this letter on behalf of my good friend, Mr. [REDACTED], a juvenile lifer, who is before you in hopes of gaining his long-awaited and well deserved freedom. I have known Alphonso since the age of 10 years old. We attended an elementary school together as well as a year in junior high school. We spent our free time in the local park and played street hockey together for hours on end.

Unfortunately, the next span of time we would spend together was within the PA state prison system. [REDACTED] and I served eight years along side of each other at both SCI Graterford as well as SCI Fayette. I was released in 1995 and have been living a happy, productive and crime-free life for approximately 23 years. I met and married my wife 18 years ago, own my own home and have opened my own business, [REDACTED] in Waynesboro, VA.

Having spent 9 years, 2 months in state custody, I know the obstacles [REDACTED] will be facing upon release from prison. I will do everything I can, to help him set realistic goals for himself and try and teach him to slow down and not expect himself to have everything the rest of the world has, within months of returning to the community. I will assist him financially and continue to give him all the advice and emotional support he needs and deserves. In addition, should he realize he wants a slower lifestyle, I can help him establish himself here in Virginia (with parole approval).

We have remained in contact throughout our lives and talk by phone on average 3-4 times a month. I know he has a strong support system waiting for him in Philadelphia. I

introduced him to his fiancée, [REDACTED] ver 22 years ago and she is still by his side. Through my continued conversations with [REDACTED] over the years, I am certain he is ready to live right and enjoy the time he has left in his life. I will be there to help him. Please give me the opportunity to do so by granting him immediate parole.

If you have any questions, feel free to contact me.

Sincerely,

[REDACTED]

[REDACTED] STREET, WAYNESBORO, VA 22980

[REDACTED]

[REDACTED]
[REDACTED] Street
Philadelphia, PA 19139

March 10, 2017

Re: [REDACTED]

Judge Streeter-Lewis
Philadelphia, PA

Pennsylvania Board of Probation & Parole
Harrisburg, PA

My name is [REDACTED] and I am writing on behalf of my friend, [REDACTED]. I met [REDACTED] when I was 19 years old (He was around 12). We were neighbors on Woolston Street and my sister Joanne, was close friends with his sisters. Alphonso and I became friends through our faith and our love of sports, namely boxing as my father was a boxer. Eventually my sister, Joanne and [REDACTED] began to date and within a few years had a daughter, my niece, Fatima. Within 18 months of Fatima's birth, [REDACTED] was sent to prison. Although Joanne's relationship with him dissolved, our families remained close.

I myself am a returning citizen. I have made mistakes and served a lengthy sentence. I know some of the struggles [REDACTED] will face upon his release and I will be there to help guide and encourage him. I am now married with 4 children and 3 grandchildren. My life consists of my family, work and my faith. I know the importance of having positive people in your life and educating yourself through classes or job trainings. I will help motivate [REDACTED] to stay on the right track and continue being the best man he can be.

[REDACTED] and I talk every week, I send him money when I can and we also stay in touch by writing letters. We are all looking forward to his coming home and starting the next chapter of his life.

Respectfully,

[REDACTED]

[REDACTED]

APPENDIX C

Organizational Letters of Support

- **Friends Rehabilitation Program (FRP)**
 - **Shawn Johnson, MSS, MS, MLSP, Social Service Coordinator**

- **Center For Employment Opportunities (CEO)**
 - **Hillary Faccine, Life Skills Educator & Job Coach**

- **Impact Services Corporation**
 - **Jason Cosley, Director, Reentry Program**

- **Penn Medicine / Hall-Mercer Community Mental Health Center of Pennsylvania Hospital**
 - **Lauren Pilar Cliggitt, LCSW, Trauma Clinician & Program Coordinator**

- **Community Education Centers (CEC)**
 - **Monique D. Hendricks, Director of Reentry - Eastern Region**

- **Community Learning Center**
 - **Carrie Kitchen-Santiago, Executive Director**



704-706 W. Girard Avenue Philadelphia, PA 19123

To Whom It May Concern:

Friends Rehabilitation Program (FRP) is a Quaker values-based affordable housing and social service provider working in the Philadelphia region. We aim to transform neighborhoods through community-based economic development, sustainable affordable housing, and transitional opportunities for marginalized populations. By integrating best practices in sustainable and equitable development, FRP focuses on empowering lives, unlocking value, and fostering vibrant, creative communities.

FRP's partnerships have been instrumental in facilitating successful reentry by offering experience, education, and economic security through paid on-the-job training, certified training, and job placement to select individuals returning from the prison system.

FRP is pleased to partner with The Youth Sentencing & Reentry Project (YSRP) to promote and facilitate successful reintegration for returning citizens. More specifically, we look forward to working with Mr. [REDACTED] to secure safe and affordable housing and engage social services to address comprehensive needs. FRP understands the complexity of reintegration and is prepared to offer therapeutic support/referrals and linkage to community resources designed to promote self-sufficiency. There will also be opportunities for [REDACTED] to connect with a mentor, who may serve as a guide upon his return to the community.

Please feel free to contact me with questions or comments at 215-825-8800 ext. 109.

Sincerely,

Shawn Johnson, MSS, MS, MLSP
Social Service Coordinator
Friends Rehabilitation Program

change that works

December 23, 2016

Hillary Facchine
Life Skills Educator/Job Coach
Center for Employment Opportunities
245 N. Broad St., 3rd Floor
Philadelphia, PA 19107

Judge Kathryn Streeter-Lewis
Court of Common Pleas, Trial Division - Criminal
Criminal Justice Center, Room 1218
Philadelphia, PA 19107

Dear Judge Streeter-Lewis,

I am writing to you on behalf of my organization, the Center for Employment Opportunities. I would like to provide you with some information about the services we are willing to provide for Mr. [REDACTED] when he is granted parole.

The Center for Employment Opportunities (CEO) is a comprehensive employment program that provides services to men and women with criminal convictions. We follow a tightly structured and data-driven model that includes life skills education, transitional work, job placement services and post-placement retention services. Our organization works most effectively with individuals who have been recently released from incarceration. We have undergone an independent evaluation that showed CEO significantly reduced recidivism rates among randomly assigned participants by up to 22%. CEO is based in New York City but over the past decade we have expanded to serve communities in eleven major cities across the country. The Philadelphia office of CEO has been in operation since August 2015.

Participants who enroll in our program begin with Life Skills Education class, a four-day orientation to the program that covers resume-building, online job applications, interview skills and goal-setting. After graduating from Life Skills Education class participants are immediately hired for a temporary, transitional job. In Philadelphia our participants work through Parks and Recreation and earn \$12/hour. Participants can work on our crew up to four days a week. This transitional job helps them build a work history and develop positive behavioral patterns that they can apply to future jobs. On their days off participants are expected to come into the office and work with a job coach or job developer to get them ready for employment and subsequently match them in a permanent, full time (20+ hours/week) job. We follow up with participants on a

PHONE 212 422 4430 FAX 212 422 4855 WWW.CEOworld.org MAILING Broadway, Suite 1404, New York, NY 10004

CELEBRATION David L. Madson CHIEF EXECUTIVE OFFICER / EXECUTIVE SENIOR Sam Schechter
BOARD OF DIRECTORS Snow Aronson Elizabeth Collier Catherine DeGallary Steven Finkler Eric V. Halperin Joel S. Kormanik
Jonathan S. Miller Tom S. Peter Shorwood William Tolpin Andrew von der Vord Grubbs Gray

CEO is a nonprofit corporation



change that works

regular basis throughout their first 365 days of employment to provide support as they navigate their first year of work.

We believe that Mr. [REDACTED] would benefit greatly from receiving our services. When he enrolled in our program we would provide him with assistance in a variety of areas including but not limited to resume-building, interview skills, goal-setting, computer skills and internet safety. Upon enrollment we would guarantee him a temporary, transitional job paying \$12/hour; he would receive his pay on a debit card at the end of each work day. We would also provide him with job placement services and intensive post-placement support throughout his first year of employment.

Mr. [REDACTED] has already taken the first step toward enrolling in our program by requesting information through his defense team. I will provide him with some informational material and instructions on obtaining a referral. When Mr. [REDACTED] is granted release his parole officer would provide a referral to our organization. Once his referral is approved Mr. [REDACTED] would be able to start our program within two to four weeks of being released.

Thank you for the opportunity to explain our program and our plans to work with Mr. [REDACTED]. Please contact me if you would like any additional information about our program.

Respectfully,



Hillary Facchine





February 3, 2017

DOB: [REDACTED]


Dear Judge Streeter-Lewis,

Impact Service Corporation (Impact) is pleased to offer its support and commitment to assist the Youth Sentencing & Reentry Project's (YSRP) their reentry to the Philadelphia community. Impact has worked with returning offenders since 1974. Impact serves over 1,500 returning offenders annually through its various comprehensive employment and training programs which provide case management, supportive services, in-demand certificate training, and job placement.

Impact looks forward to assisting YSRP's clients and connecting them to resources such as enrollment into public benefits, clothing, housing, treatment which will support their successful reintegration into their communities and Philadelphia's workforce. Impact currently provides Transitional Offender Workforce Development (TOWD) services for the Pennsylvania Department of Corrections. Impact understands that Mr. [REDACTED] will be released under the supervision of the Pennsylvania Board of Probation and Parole, he will be eligible to participate in TOWD and additional Impact programs.

Additionally, Impact operates the Pennsylvania CareerLink Northwest Center located in the Germantown section of Philadelphia and will ensure that Mr. [REDACTED] is registered and able to receive services offered through the PA CareerLink.

Sincerely,


Jason Cosley
Director, Reentry Programs
Impact Service Corporation

January 27, 2017

Dear Ms. Fennell,

The Hall-Mercer Community Mental Health Center of Pennsylvania Hospital provides comprehensive outpatient services to Philadelphia residents in need. Hall-Mercer distinguishes itself from other community based services through its affiliation with Pennsylvania Hospital and Penn Medicine. This special relationship offers immediate access to a wide range of behavioral health programs and some of the area's most recognized clinicians.

While we would need to formally assess Mr. [REDACTED] to best fit his needs upon his re-entry to society, we believe our Outpatient Program could assist him in his transition. Once Mr. [REDACTED] is granted parole, we will set up an appointment for him and administer a Level of Care Assessment (LOCA) so that we can determine eligibility and appropriate level of care. Assuming he meets eligibility criteria, Mr. [REDACTED] will be registered and further evaluated and offered treatment for his symptoms.

We look forward to working with Mr. [REDACTED] and assisting him with his long awaited transition back into society.

Sincerely,



Lauren Pilar Cliggitt, MSW, LCSW
Coordinator of Child Trauma Services,
Coordinator of PHIICAPS (Philadelphia Intensive In-home Child and Adolescent Psychiatry Service) & Trauma Clinician
Hall Mercer Community Mental Health Center
lauren.cliggitt@uphs.upenn.edu
[215-829-6463](tel:215-829-6463)



February 23, 2017

Re:

State ID# [REDACTED] DOB: [REDACTED]

Ms. Fennell:

Community Education Centers, Inc. prides itself in providing quality treatment for men and women across the nation. Our Erie Outpatient treatment facility offers comprehensive outpatient services to Philadelphia residents in need of assistance. Erie outpatient accepts walk-ins, mandates and referrals from inpatient programs and community organizations. Erie Outpatient is a licensed drug and alcohol facility accepting Medicaid and BHSI funding.

We provide an array of services consisting of, but not limited to:

Intakes and Assessments
Individual and Group Counseling
Peer support groups
Trauma Informed Care
Family Sessions
Connections with Community Networking

Our partnerships with county, state, and federal agencies allows us to address the unique needs of the men and women returning to our communities from jail and institutions. We pride ourselves in ensuring that we provide comprehensive assessments that identify relapse prevention issues, wrap around services that may be warranted. (i.e. Vocational, GED, Housing, Employment, Health organizations, etc.), and any mental health concerns needing to be addressed. Our addictions treatment extends beyond drug and alcohol concerns and due to the rising number of clients with gambling problems, we are equipped to assess, treat and refer to the necessary support programs.

Mr. [REDACTED] will then be provided with our in-house services as needed and will work closely with our partner community organizations when needed for other services. Once an initial treatment plan has been completed, we work closely with Mr. [REDACTED] to ensure his goals are being met and subsequent follow-up is occurring. Ultimately, clients progress through a continuum of care for sustainable success.

Of course, Mr. [REDACTED] will be assessed and a treatment plan completed specific to his needs. If no treatment is warranted, then that will be the recommendation. If only a referral to a support agency is necessary, then that will be the recommendation. We want to provide Mr. [REDACTED] with the necessary support and assistance to allow him to be successful.

CEC looks forward to being a partner in this most important work that YSRP is embarking on. We are as enthusiastic about assisting in this endeavor as we are about the work of treatment itself.

Please do not hesitate to ask for any additional information.

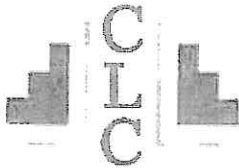
Erie Outpatient Facility
3768 L Street
Philadelphia, PA 19124
Phone: 215-744-9601

Sincerely,

A handwritten signature in black ink, appearing to read "Monique D Hendricks". The signature is written in a cursive style with a large, stylized initial "M".

Monique D Hendricks

Director of Reentry - Eastern Region



2701 N. Broad Street, Philadelphia, PA 19132 (at Lehigh and Broad)
Phone: 215.426.7940 | www.communitylearningcenter.org | www.facebook.com/phillyCLC

Community Learning Center
Changing Lives Through Literacy

March 8, 2017

Youth Sentencing & Reentry Project
Attn: Erin L. Fennell, M.A.
123 South Broad Street, 24th Floor
Philadelphia, PA 19109

Re [REDACTED]
D.O.B. [REDACTED]

Dear Ms. Fennell,


Community Learning Center's mission is to help adults develop literacy, math and life skills using a supportive and holistic approach, so they can realize their fullest potential at home, in the workplace and in the community. CLC provides free adult basic education, high school equivalency preparation, workforce preparation and tutoring.

Having spoken with you regarding Mr. [REDACTED] it appears he would benefit from our Student Support Program. There he will receive essential support within classes and tutoring groups. SSP can provide Mr. [REDACTED] transition support to educational services, job readiness instruction, and digital and financial literacy workshops. SSP staff will hold personal meetings with Mr. [REDACTED] to help him stay on track. In addition, they can also refer him to local social service agencies as needed.

CLC collaborates with organizations whose mission and services align with those of CLC and has been chosen to be one of three organizations selected to serve as campus for myPlace, an adult literacy and career preparation initiative spearheaded by the city's Office of Adult Education (formerly the Mayor's Commission on Literacy). CLC also runs an upskilling clinic at PA CareerLink Suburban Station to help adults enter job training programs. In addition, CLC can help Mr. [REDACTED] obtain job leads through our employer partnerships.

Upon Mr. [REDACTED] parole and reentrance into society we will assess his needs holistically, identify needed resources and commit to supporting his transition back to our community. We look forward to working with you and Mr. [REDACTED]. Should you have any questions, please feel free to contact us.

Sincerely,


Carrie Kitchen-Santiago
Executive Director