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February 15, 2023

United States Sentencing Commission
One Columbus Circle, N.E.
Suite 2-500
Washington, D.C. 20002-8002
Attention: Public Affairs – Proposed Amendments

Re: Written Statement Regarding Proposed Amendments to the
U.S. Sentencing Guidelines for Compassionate Release

To the Commission:

I submit this statement on behalf of the Aleph Institute (“Aleph”) and the Center for Justice and Human Dignity (“CJHD”), in anticipation of my February 23, 2023 testimony regarding proposed amendments to the U.S. Sentencing Guidelines (“Guidelines”) relating to what is commonly referred to as compassionate release. I represent both organizations on a *pro bono* basis and am a member of CJHD’s Board of Directors.

Aleph and CJHD commend the U.S. Sentencing Commission (“Commission”) for proposing amendments to the compassionate release policy statement that will significantly help effectuate Congress’ directive that the Commission delineate the circumstances under which persons in federal custody may be released or have their sentences reduced for extraordinary and compelling reasons. The proposed amendments constitute an appropriate combination of tangible examples of what would constitute “extraordinary and compelling” reasons, along with a suitable avenue for judges to apply the policy statement and underlying statute in non-delineated circumstances that would also qualify a defendant for potential relief. In this letter, I provide comments on the proposed amendments, and also respond to the issues that the Commission has identified for comment.

By way of background, Aleph (www.aleph-institute.org) is a 501(c)(3) nonprofit organization, formed in 1981, that is committed to using its faith-based perspective to improve our criminal legal system. Aleph focuses on education and rehabilitation of the individual while minimizing, to the extent possible and consistent with public safety, the devastating collateral consequences that often result from incarceration. Aleph has submitted written sentencing proposals to judges on behalf of dozens of defendants, often making the case that defendants may be held accountable by means other than incarceration. Aleph has worked tirelessly to improve conditions of confinement; to provide crucial financial, emotional, and spiritual assistance to thousands of incarcerated individuals and their family members to help them withstand the often-devastating effects of incarceration; and to develop re-entry programs for those imprisoned. Aleph

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also has supported the religious and spiritual needs of thousands of members of the United States armed forces. Aleph also fosters prevention by educating segments of the community about avoiding the criminal legal system in the first place – by guiding people toward ethical behavior, honesty and integrity in their business and personal lives. Aleph provides its services on a *pro bono* basis to individuals of diverse racial, ethnic, gender, religious, and other backgrounds.

Aleph has worked cooperatively and productively over the years with hundreds of current and former federal and state judges, prosecutors, probation officers, prison officials, and members of Congress from across the country – including former Attorneys General and Deputy Attorneys General, Bureau of Prisons directors, U.S. Attorneys, and District Attorneys. Aleph played an instrumental role in securing passage of the First Step Act of 2018, which brought about much-needed reforms to the federal criminal punishment system. Aleph also hosted two summits, in 2016 (at Georgetown Law School) and 2019 (at Columbia Law School), devoted to exploring alternatives to traditional criminal punishment – with both conferences attended by hundreds of people, including current and former judges, prosecutors, probation officers, prison officials, academics, and other criminal justice stakeholders.

CJHD (www.cjhd.org) is a 501(c)(3) nonprofit organization that was incubated at and is supported by Aleph. Its mission is to safely reduce incarceration in the United States while improving conditions for incarcerated individuals and correctional staff. CJHD promotes values of human dignity, shared safety, and sensitivity to the needs of those most directly impacted by the criminal legal system – including victims, defendants, and society at large. It has a steering committee of 20 current and former federal and state court judges, and a board of directors that includes, among others, Larry Thompson (former U.S. Attorney and Deputy Attorney General of the United States), and Jeremy Fogel and Nancy Gertner (retired U.S. District Court judges). CJHD plans to host a summit this fall, with Aleph as a primary sponsor – similar in kind to Aleph’s 2016 and 2019 summits.

I. Proposed Amendments

I comment on the three categories of proposed amendments, addressing (1) who can make a motion for compassionate release, (2) specific examples of what constitutes extraordinary and compelling reasons justifying such relief, and (3) the options for a residual provision allowing for such relief in other non-delineated circumstances.

Who Can Make a Motion for Compassionate Release

The amendment stating that a defendant, as well as the Bureau of Prisons, may make a motion for compassionate release is an appropriate effectuation of Congress’ 2018 amendment of the compassionate release statute, harmonizing the Guidelines with the current state of the law.

Specific Examples of What Constitutes an Extraordinary and Compelling Reason

The amendments setting forth additional examples of extraordinary and compelling reasons warranting a defendant’s potential release are well-crafted and justified expansions of the current policy statement. I discuss each in turn.

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Medical Care. The two amendments addressing medical care in prison are an apt recognition of the fact that the BOP may be unable to provide the requisite level of medical care to certain defendants who need such care in order to maintain their health or even save their lives. Although it is the BOP's obligation to provide adequate medical care to those in its custody (and BOP Director Colette Peters has taken important steps toward meeting this obligation), regrettably the BOP is not always able to do so. Indeed, some courts already have concluded that medical considerations may warrant compassionate release, for both defendants who receive inadequate care¹ as well as individuals who are especially vulnerable to COVID.²

The Commission should consider not limiting proposed subsection (b)(1)(C) to defendants with conditions requiring “long-term” or “specialized” care. Circumstances could arise in which a defendant's medical condition does not rise to either level, but the lack of timely and adequate medical care could nevertheless put the defendant's health or life in serious jeopardy. Likewise, to the extent the two proposed provisions both address the level of medical complication or deterioration required for relief, they should do so consistently; thus, for pandemic-related situations, the defendant should only be required to demonstrate “serious” (rather than “severe”) medical complications in order to qualify for relief. While the two standards are presumably similar, the Commission can easily remove any doubt about that by using the same standard for both provisions.

Family Circumstances. All three proposed amendments – expanding the family circumstances that qualify as extraordinary and compelling to (1) adult children needing care, (2) incapacitated parents needing care, and (3) other similarly-situated immediate family members (or their equivalent) needing care – are carefully crafted and appropriate examples of family circumstances that should qualify under the compassionate release provision. Indeed, the amendments all appropriately recognize a broader classification of immediate family members who are very close to an incarcerated defendant and who need the defendant's care, but who will not receive such care because of the defendant's incarceration. An adult child or parent, no less than a minor child or spouse/partner, should be able to receive such care if another caregiver is unavailable to provide it. All are members of the defendant's immediate family, and as several

¹ See, e.g., *United States v. Lindell*, 517 F. Supp. 3d 1141, 1146–49 (D. Haw. 2021) (granting compassionate release based on defendant's ongoing loss of vision due to inadequate treatment in prison); *United States v. Smith*, 464 F. Supp. 3d 1009, 1018–20 (N.D. Iowa 2020) (granting compassionate release based on the failure to timely diagnose and treat defendant's cancer in prison); *United States v. Beck*, 425 F. Supp. 3d 573, 580–82 (M.D.N.C. 2019) (granting compassionate release where defendant developed stage 3 breast cancer due to inadequate treatment in prison).

² See, e.g., *United States v. Bedal*, No. 20-02-M-DWM-02, 2023 WL 113709, at *2 (D. Mont. Jan. 5, 2023) (high blood pressure, PTSD, anxiety, obesity); *United States v. Corral*, No. 05-80617, 2022 WL 17484271, at *5–6 (E.D. Mich. Dec. 6, 2022) (immunocompromised); *United States v. Pimentel-Garcia*, No. 4:07-cr-00088-BLW, 2022 WL 4941178, at *4–5 (D. Idaho Oct. 4, 2022) (age, hypertension, obesity, and other factors); *United States v. Ward*, No. ELH-18-198, 2022 WL 4120582, at *11–14 (heart disease, diabetes, asthma, hypertension, and obesity) (citing numerous cases); *United States v. Smith*, 464 F. Supp. 3d 1009, 1021–22 (N.D. Iowa 2020) (lung disease, obesity, cancer) (citing numerous cases).

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courts have held, there is no persuasive justification for treating them any differently for purposes of the compassionate release provision.³

The proposed amendment also provides narrowly tailored but sufficient flexibility for other situations in which another immediate family member (for example, a sibling) or someone with a similar familial relationship to the defendant (such as a grandparent or grandchild, especially one that used to live with or was cared for by the defendant) requires the defendant's care. Moreover, it would allow for a defendant whose care was needed by a close family friend to meet the standard in cases where the relationship between the two is equivalent to a familial one. Here, too, there is no good reason to exclude such individuals from the ambit of those whose need for care might justify a defendant's release.

Sexual Assault and Physical Abuse. This proposed amendment, similar to the amendment addressing medical care, recognizes circumstances in which the BOP is unable to provide appropriate care for those in its custody because a BOP employee or contractor sexually assaults or physically abuses a defendant, rather than ensures their physical safety. BOP's inability to provide an incarcerated defendant protection from such assaultive conduct is an extraordinary and compelling reason that may justify the defendant's release from BOP custody. The U.S. Department of Justice has recognized that an incarcerated individual who becomes the victim of a sexual assault perpetrated by BOP personnel should be eligible for compassionate release,⁴ and there is no good reason in this context not to include non-sexual assaults as well (so long as the other proposed criteria for compassionate release are satisfied).

The Commission should consider whether the "serious bodily injury" requirement is necessary and appropriate in order to qualify as an extraordinary and compelling reason. Both sexual assaults and physical abuse can and do result in extreme mental distress, emotional damage, and psychological harm, even where serious (or any) physical injury does not result. This is inherent in the fact that, under the terms of this provision, such conduct will have been committed by the very people who are legally obligated to protect (rather than assault or abuse) these victims. One can easily envision situations where a prison guard repeatedly assaults or abuses an incarcerated person over a period of time without inflicting serious physical injury upon the person. And while the Guideline definition of "serious bodily injury" dispenses with a physical injury requirement in cases of sexual abuse (*see* U.S.S.G. 1B1.1, Application Note 1(M)), that requirement would (under the proposed amendment) remain for all other instances of physical abuse of incarcerated persons by corrections employees or contractors. Therefore, the Commission should consider either eliminating the "serious bodily injury" requirement from the proposed

³ *See, e.g., United States v. Meister*, No. 17-296(1), 2022 WL 16966707, at *2 (D. Minn. Nov. 16, 2022) (mother and stepfather); *United States v. Trapps*, No. 15-cr-00382-JSW-1, 2022 WL 16706710, at *2 (N.D. Cal. Nov. 4, 2022) (mother) (collecting cases); *United States v. Rushworth*, No. 2:18-CR-230-RMP-2, 2022 WL 7692147, at *1-3 (E.D. Wash. Oct. 13, 2022) (18 and 15-year-old children with mental health conditions); *United States v. Gibson*, No. 18-20091-JAR-4, 2021 WL 5578553, at *2 (D. Kan. Nov. 30, 2021) (adult son with schizophrenia, depression, and anxiety).

⁴ *See* Glenn Thrush, *Justice Dept. Considers Early Release for Female Inmates Sexually Abused Behind Bars*, THE NEW YORK TIMES (Dec. 13, 2022), available at <https://www.nytimes.com/2022/12/13/us/politics/federal-prison-sexual-abuse.html>.

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amendment, or providing that this requirement is satisfied in both sexual and non-sexual assault or physical abuse cases by either physical or non-physical injury.

The Commission should also consider clarifying that this provision encompasses a corrections employee or contractor who aids and abets the sexual assault or physical abuse of an incarcerated person, even if the principal who carries out the actual assault or abuse is not a corrections employee or contractor. For example, if a prison guard were to knowingly arrange for or allow a visitor, or another incarcerated individual, to assault or physically abuse an incarcerated person, this too should qualify for relief under the compassionate release provision if all the other requirements are met.

Changes in the Law. The proposed amendment recognizes that a post-sentencing change in the law that renders a defendant's sentence inequitable should, in appropriate cases, qualify as an extraordinary and compelling reason for compassionate release. A growing body of case law makes clear that certain changes in the law – for example, changes to statutory penalties or Guideline provisions that reflect a current judgment by Congress or the Commission that previously prescribed punishments were unduly harsh or otherwise unjust – can result in defendants serving sentences far lengthier than would be imposed on them now. These courts correctly recognize that this unusual circumstance, along with other factors relating to the defendant's individual circumstances, can constitute an appropriate basis for compassionate release.⁵

The Commission's proposed amendment would recognize the correctness of these decisions. Indeed, it would help effectuate Congressional intent, upon enactment of the statutory compassionate release provision, to make compassionate release available under these very circumstances.⁶ This proposed amendment would also resolve an inter-circuit conflict concerning whether changes in the law can ever serve as a basis for compassionate release⁷ – something that the Commission is uniquely positioned to do with respect to the scope and interpretation of a Guideline provision.

To put into perspective the necessity for this change, consider that on January 28, 2022, two district courts issued inconsistent decisions on petitions by defendants serving mandatory federal life sentences that, today, would not apply due to non-retroactive changes in the law.⁸ Only

⁵ See *United States v. Chen*, 48 F.4th 1092, 1098 (9th Cir. 2022); *United States v. Ruvalcaba*, 26 F.4th 14, 16, 24, 27–28 (1st Cir. 2022); *United States v. Maumau*, 993 F.3d 821, 837 (10th Cir. 2021); *United States v. McCoy*, 981 F.3d 271, 286–88 (4th Cir. 2020).

⁶ See S. Rep. 98-225, at 55–56 (1984) (compassionate release intended to be available in “some cases in which the sentencing guidelines for the offense of which the defend[ant] was convicted have been later amended to provide a shorter term of imprisonment”).

⁷ See *United States v. Chen*, 48 F.4th 1092, 1096–98 (9th Cir. 2022) (discussing circuit court conflict over this issue).

⁸ Compare *United States v. Gamboa*, No. 2:08-cr-00151-2, 2022 WL 275528 (S.D. W.Va. Jan. 28, 2022) (reducing sentence to new mandatory minimum of 25 years) with *United States v. Walker*, No. 1:05-cr-70-HAB, 2022 WL 263441, at *7 (N.D. Ind. Jan. 28, 2022) (“The Court understands Defendant’s Section 401

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one of the district courts had the authority to grant compassionate release in these circumstances; the other was in a circuit that forbade consideration of this factor as a basis for such relief. As a result, one defendant's sentence was reduced, while the other defendant's sentence was not. The Commission can, and should, rectify this unjust inconsistency by specifying that courts have authority to rely on such a change in the law, along with other factors, when deciding whether to grant compassionate release.

Availability of Compassionate Release in Other, Non-Delineated Circumstances

Aleph and CJHD agree that the compassionate release policy statement should continue to include a provision allowing for non-specified circumstances to qualify as “extraordinary and compelling reasons” supporting compassionate release. Option 3 accomplishes that. In that regard, the Commission is entirely correct to propose that the BOP no longer be the sole arbiter of what does or does not qualify under the “other circumstances” provision. This provision, a vestige of the period in which the BOP was the sole authorized movant for compassionate release, was rendered anachronistic by the First Step Act of 2018, which gave defendants the right to seek such relief in their own right. That change made clear that it is ultimately up to the courts, and not the BOP, to determine whether a defendant has presented extraordinary and compelling reasons rendering them eligible for compassionate release.

That courts would not have to defer to the BOP in deciding what constitutes an “extraordinary and compelling reason” for compassionate release is consistent with the broad discretion historically entrusted to courts in making sentencing decisions. Indeed, as the Commission itself has recognized (in Application Note 4 to 1B1.13), the “court is in a unique position to determine whether the circumstances warrant a reduction” under this policy statement. Thus, the standard under the “other circumstances provision” should be whether “the defendant presents” such circumstances (as the proposed amendment provides), and not whether the “Director of the Bureau of Prisons” determines that such circumstances are present (as the current policy statement provides).

In addition, while the Commission has done a commendable job of identifying specific examples of what constitutes an extraordinary and compelling reason potentially justifying a lower sentence, a residual or “catch-all” provision appropriately accounts for the fact that there may be unusual or unanticipated circumstances that, though not specified, meet that standard. For example, in 2019, few, if any, could have anticipated that a global pandemic would result in incarcerated defendants (through no fault of their own) enduring far harsher conditions of confinement than would ordinarily be the case – marked by lockdowns, quarantining, no visitation, limited opportunities to participate in educational and vocational programs or receive other services, and living in constant fear of contracting a potentially deadly disease in confined quarters. But the pandemic did come to pass, and several courts have correctly relied on that extraordinary circumstance, alone or in combination with other factors, in granting sentence reductions under

argument. It might even agree with the conclusion Defendant reaches. But the Seventh Circuit does not so agree.”).

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the compassionate release provision.⁹ As one court put it, in granting a compassionate release motion of a defendant who spent 10 months in “severe conditions occasioned by the current COVID-19 pandemic,” “a day spent in prison under extreme lockdown and in well-founded fear of contracting a once-in-a-century deadly virus exacts a price on a prisoner beyond that imposed by an ordinary day in prison....[I]ncarceration in such circumstances is, unavoidably, experienced as more punishing.”¹⁰

II. Issues for Comment

Comments in response to the five specific “issues for comment” identified by the Commission are set forth below.

1. The proposed amendments addressing changes in law (subsection (b)(5)) and the “other circumstances” provision (subsection (b)(6)) do not exceed the Commission’s legal authority. Congress conferred upon the Commission broad authority to promulgate sentencing guidelines and policy statements, including a policy statement relating to the specific subject matter here – compassionate release.¹¹ The latter grant of authority expressly empowers the Commission to “describe what should be considered extraordinary and compelling reasons for sentence reduction, including the criteria to be applied and a list of specific examples.” Subsection (b)(5) is one such example, and subsection (b)(6) simply recognizes that there may be circumstances beyond the specific examples provided that would likewise qualify under the policy statement. In that respect, the policy statement is similar to the departure provisions of Chapter 5, which provide both specific examples of circumstances in which an upward or downward departure would be permissible,¹² as well as authority for courts to depart in other circumstances.¹³ Nothing in the authorizing statute mandates that the Commission provide an all-inclusive, exhaustive list of each and every circumstance that constitutes an “extraordinary and compelling” reason supporting compassionate release; rather, Congress called on the Commission to provide “examples” – which it has done.

2. As a general matter, the proposed amendments to the compassionate release policy statement and commentary are a reasonable and justified implementation of Congress’ directive to the Commission to set forth the criteria for what constitutes an extraordinary and compelling

⁹ See, e.g., *United States v. Tucker*, No. 21-2142, 2023 WL 408949, at *1 (2d Cir. Jan. 26, 2023) (noting that district court granted compassionate release motion, reducing defendant’s sentence by a year, based in part on “the unanticipated hardships of the pandemic”); *United States v. Oquendo*, No. 13-cr-357-1, 2023 WL 199609, at *5 (S.D.N.Y. Jan. 17, 2023); *United States v. Jones*, No. 3:11-cr-282, 2022 WL 3702087, at *7 (E.D. Va. Aug. 26, 2022); *United States v. Batista*, No. 18-cr-319-LTS-7, 2022 WL 1997173, at *4–5 (S.D.N.Y. June 6, 2022); *United States v. Dones*, No. 3:18-cr-00246, 2021 WL 6063238, at *3–4 (D. Conn. Dec. 22, 2021).

¹⁰ See *United States v. Mcrae*, No. 17-cr-643, 2021 WL 142277, at *3, 5 (S.D.N.Y. Jan. 15, 2021).

¹¹ 28 U.S.C. §§ 994 (a), (t).

¹² See, e.g., U.S.S.G. 5H1.1, .3–4, 11; 5K1.1; 5K2.1–14, .16–18, .20–24; 5K3.1.

¹³ See, e.g., U.S.S.G. 5K2.0(a)(2)(B), (a)(3) – (4).

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reason for compassionate release. To the extent Aleph and CJHD believe the Commission should make additional or different changes than those set forth in the proposed amendments, I have included those recommendations in this statement.

3. For similar reasons, the proposed categories of circumstances constituting extraordinary and compelling reasons are appropriate (with a small number of suggested changes, described above) and provide clear guidance to the courts and the Bureau of Prisons – as well as to defendants and other stakeholders in the criminal justice process. Furthermore, Aleph and CJHD believe the Commission has struck an appropriate balance between providing several specific examples of qualifying circumstances and still allowing for the possibility that other circumstances also could qualify, as determined through the reasonable exercise of discretion by the judiciary after considering the specific facts and circumstances of an individual case.

4. As noted above, Aleph and CJHD believe that the proposed amendment addressing sexual assault and physical abuse of an incarcerated person by correctional staff should be expanded to include such conduct when committed by another prisoner when the conduct in question is aided and abetted by correctional staff.

5. The proposed amendments to the compassionate release policy statement – and, in particular, those addressing “changes in law” and “other circumstances” – are not inconsistent with the Guideline’s standard for which Guideline amendments are retroactive in application. The proposed change-in-law provision (1B1.13(b)(5)) is broader than the Guideline amendments provision (1B1.10) and thus covers, for example, changes in statutory charging and sentencing provisions, or court decisions altering what sentence may be imposed in particular situations. Each of these may result in the demonstrably inequitable situation of a defendant serving a far longer sentence than would otherwise be the case were the defendant sentenced today for the same conduct.

To the extent the change-in-law provision may also apply to a change in the Guidelines, that circumstance was expressly contemplated by Congress when it enacted the compassionate release provision in 1984.¹⁴ This proposed amendment makes clear that, consistent with Congressional intent, a court is empowered to provide for compassionate release if a change in the Guidelines presents an extraordinary and compelling reason supporting release in a particular case, even if the Commission does not categorically provide for retroactive application of the Guideline change in all cases under Guideline 1B1.10. As one court put it, the “compassionate release statute was intended to provide “a ‘safety valve’ with respect to situations in which a defendant's circumstances had changed such that the length of continued incarceration no longer remained equitable.”¹⁵

¹⁴ See page 5 *supra* (compassionate release intended to be available in “some cases in which the sentencing guidelines for the offense of which the defend[ant] was convicted have been later amended to provide a shorter term of imprisonment”).

¹⁵ *United States v. Ruvalcaba*, 26 F.4th 14, 26 (1st Cir. 2022); see *United States v. McCoy*, 981 F.3d 271, 287 (4th Cir. 2020) (“Indeed, the very purpose of § 3582(c)(1)(A) is to provide a ‘safety valve’ that allows for sentence reductions when there is *not* a specific statute that already affords relief but ‘extraordinary and

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This is also consistent with the fact that Congress was well aware that it could limit the scope of the compassionate release provision if it wished to do so. Indeed, it did so – but only with respect to a single factor, rehabilitation.¹⁶ It has not legislated any other limitation on what can or cannot be considered an “extraordinary and compelling reason” under the statute, or corresponding Guideline policy statement. Thus, there is no legal proscription on the Commission permitting courts to consider the impact of changes in the law in determining whether the standard for compassionate release has been met.¹⁷

The proposed amendment also is consistent with several circuit court decisions analyzing the interplay between statutory non-retroactivity provisions and the compassionate release statute and Guideline. Those courts have correctly held that there is, in fact, no inconsistency between the two: a judgment that certain changes in sentencing-related laws should not be applied categorically to all cases without consideration of any other factors, in no way prohibits a court from considering whether, in a defendant’s particular case, based on the change in law as well as all the other relevant facts and circumstances, there exists an extraordinary and compelling reason supporting compassionate release.¹⁸

We recommend that the Commission make clear that changes in the law can support compassionate release when considered together with all the other facts and circumstances of a defendant’s particular case, including the factors set forth in 18 U.S.C. § 3553(a), and that release based on a change in the law should not be considered automatic. This is consistent with how several courts have already applied this particular factor in compassionate release cases.¹⁹

compelling reasons’ nevertheless justify a reduction.”); *see also United States v. Chen*, 48 F.4th 1092, 1098–99 (9th Cir. 2022) (similar)

¹⁶ *See* 28 U.S.C. § 994(t) (“Rehabilitation of the defendant alone shall not be considered an extraordinary and compelling reason.”).

¹⁷ *See Chen*, 48 F.4th at 1098–1100; *Ruvalcaba*, 26 F.4th at 26; *see also Concepcion v. United States*, 142 S. Ct. 2389, 2396 (2022) (district court can consider intervening changes in law or fact in exercising its discretion to reduce a sentence pursuant to § 404 of the First Step Act; “[i]t is only when Congress or the Constitution limits the scope of information that a district court may consider in deciding whether, and to what extent, to modify a sentence, that a district court’s discretion to consider information is restrained.”).

¹⁸ *See Chen*, 48 F.4th at 1098; *Ruvalcaba*, 26 F.4th at 27; *McCoy*, 981 F.3d at 286–87.

¹⁹ *See* note 5 *supra*.

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Conclusion

I appreciate the opportunity to submit these comments to the Commission as it considers these timely and important topics. By taking the actions it has proposed, and as set forth above, the Commission can take meaningful, appropriate, and positive steps towards long-awaited improvements in federal criminal punishment.

Respectfully,

/s/ Alan Vinegrad

Alan Vinegrad

cc: Kathleen Cooper Grilli, Esq.
General Counsel