



Daniel Sweeney, Reg. #69628-112 (in Custody)  
 8141 Orion Avenue  
 Van Nuys, CA 91406  
 In Pro Se

**UNITED STATES DISTRICT COURT  
 FOR THE CENTRAL DISTRICT OF CALIFORNIA**

Daniel Sweeney, Reg.# 69628-112

Plaintiff, Petitioner

v.

Juan Herrera, in his capacity as the Residential Relocation Manager of the Federal Bureau of Prisons for the District of Los Angeles; and Kim Beakey, in her capacity as Regional Reentry Administrator, for the Federal Bureau of Prisons

Defendant(s).

**CASE NO: 2:20-CV-04247-RSWL-JEM**

Emergency Petition for Writ of Habeas Corpus Pursuant to U.S.C. § 2241, Injunctive, and Declaratory Relief For Release from Custody Due to Risk of Exposure and Imminent Death From Covid-19/Corona Virus Due to Conditions of Confinement At Orion House R.R.C.

Petitioner Daniel Sweeney, proceeding pro se for this limited purpose, respectfully submits this Emergency Petition for Writ of Habeas Corpus, Injunctive, and Declaratory Relief for an immediate reduction in sentence to time served with no modification in the terms of his supervised release based on extraordinary and compelling circumstances created by the unconstitutional conditions of his confinement which subject him daily to COVID-19 exposure and imminent risk of death.

I. Procedural History-

As a tragic combination of infectious and deadly, COVID-19 poses a once-in-a-lifetime threat on a worldwide scale. Every state and territory in the United States has now been

impacted, with 1.23 million confirmed cases and over 71,000 deaths reported to the Centers for Disease Control and Prevention (CDC).<sup>1</sup> Even under ordinary conditions, each person who contracts this illness can be expected to infect between 2 and 3 others.

Cramped, overcrowded prisons and federal and state “Reentry Centers”, or “halfway houses” as they are more commonly known, amplify this threat. With dozens of people literally stacked on top of each other and unable to move around without rubbing shoulders, such environments are fundamentally incompatible with medically-indicated social distancing and hygiene protocols. As a result, they present a grave threat not only to prisoners and staff, but also to the broader community by enabling the spread of COVID-19 both inside and outside the facility walls.

This danger is playing out with disastrous consequences at Orion Residential Reentry Center in Van Nuys, California. Orion is a federally contracted residential reentry facility, or halfway house, that serves as residence and place of confinement for federal and state prisoners who are preparing to reenter into the local community. The Plaintiff is currently confined to Orion Reentry Center for the remainder of his term of imprisonment which is set to expire on September 2<sup>nd</sup>, 2020. The facility is currently putting the plaintiff’s life and health at grave risk because of the following:

- The Re-Entry Center, Orion House located at 8141 Orion Ave. Van Nuys, CA 91406, is NOT practicing any mandated BOP, State or local Govt. social distancing protocols. These conditions include:
  - Orion House RRC requires inmates to sleep and live in close quarters (less than 3 feet of space in between each) and is not observing State and Local Government mandated Covid-19 social distancing protocols.
  - Plaintiff’s bunk bed is within 3 feet of another inmate, in a room filled with multiple other inmates.
  - Orion RRC does not observe social distancing protocols in common areas,

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<sup>1</sup> <https://www.who.int/emergencies/diseases/novel-coronavirus-2019/situation-reports>

dining rooms, bathrooms, and forces inmates to clean common areas of the facility that may be contaminated with the Covid-19 virus:

- Orion RRC does not have an on-site medical staff nor has warned or educated inmates residents about adequate Covid-19 prevention protocol and protections and does not screen staff daily nor newly admitted inmates. It does not have a temperature gauging tool, digital thermometer, or anything comparable to complete this preventative action.
- Orion RRC continues to accept new inmates from Federal and State institutions.
- Orion House RRC does not offer inmates protective masks, hand sanitizer or other hygienic products to prevent the spread of Covid-19.

## II. Legal Argument-

The Constitutional prohibition on cruel and unusual punishment requires Respondents to provide safe living quarters, including protection from dangerous infectious diseases. E.g., *Helling v. McKinney*, 509 U.S. 25, 33-34 (1993). Yet Respondents are unable to comply with this Constitutional command without swift and sufficient releases. As other circuits have held with regard to Covid-19 confinement considerations: “Because [t]he situation at FCI Elkton in particular is alarming,” and the BOP “cannot adequately protect [the prisoner] from infection, especially in light of his vulnerability and the presence of COVID-19 in FCI Elkton,” dozens of federal and state courts have already ordered prisoners to be released from custody at facilities across the country. *United States v. Rodriguez*, No. 2:03-cr-0271, 2020 WL 1627331 (E.D. Pa., Apr. 1, 2020).<sup>2</sup>

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<sup>2</sup> In response to this guidance, jurisdictions around the world and in the United States have taken bold actions to save lives for inmates and for the community. Germany released “1,000 prisoners who are close to the end of their sentences”; Canada released “1,000 inmates in the state of Ontario”; and Iran “temporarily release[d] 85,000 prisoners, with 10,000 of them being granted pardons.”<sup>2</sup> The New Jersey Supreme Court announced that it would release “as many as 1,000 people from its jails”<sup>2</sup> and New York City is releasing more than 1,000 people from its jails.

Sweeney's Confinement at Orion House Residential Reentry Center, Los Angeles, CA Is

Unconstitutional:

Orion is one of the largest federal halfway houses in the region, with approximately 100 beds. It is one of several federally contracted halfway houses for men in the Los Angeles region. Orion, managed by a company called Behavioral Systems Southwest, houses mainly federal prisoners who are about to be released in addition to those from the State of California. During normal operations, prisoners come and go during the day for jobs and training, to look for work, to obtain medical care, to visit family, and for other necessities. As of April 29, 2020, there were over a million COVID-19 cases in the United States that were directly attributable to 61,342 deaths, with tens of thousands in the greater Los Angeles region alone. The greater Los Angeles region has been identified as a "virus hot-spot", and along with the state of California, is operating under extreme directives of 'lock-down' and social distancing mandated by State and local governments. (See: <https://covid19.ca.gov/> and <https://www.lamayor.org/COVID19Orders>). Within the context of inmates confined within BOP institutions, "as of 04/29/2020, there are **1534 federal inmates** and **343 BOP staff** who have confirmed positive test results for COVID-19 nationwide. Currently, **414** inmates and **132** staff have recovered. There have been **31** federal inmate deaths and **0** BOP staff member deaths attributed to COVID-19 disease" and "45 BOP institutions and 18 RRC's" (where Sweeney is currently confined) have confirmed cases of COVID-19 and inmate deaths. Within this context, the most affected COVID-19 BOP institutions are mere miles from where Sweeney is confined and are regularly sending inmates to Orion RRC. (See Box below, <https://www.bop.gov/coronavirus/> 4/29/20)

Cases by BOP Institution (Source: www.bop.gov, 4/29/2020)

Inmates	Staff	Inmate Deaths	Staff Deaths			
570	10	2	0	Terminal Island FCI	San Pedro	CA
298	1	3	0	Fort Worth FMC	Fort Worth	TX
212	13	6	0	Butner Medium I FCI	Butner	NC
83	15	1	0	Lompoc USP	Lompoc	CA

The Center for Disease Control and Prevention (“CDC”) and other public health experts have advised that the best method to limit transmission of the virus is to avoid gatherings and practice “social distancing.”<sup>3</sup> Health experts recommend a minimum of six feet between people, limited contact, and meticulous personal hygiene.

Contrary to State of California and City of Los Angeles policy and despite this guidance and the spreading pandemic, the Orion RRC facility has forced prisoners to sleep in close quarters and bunk beds, about three feet apart. The prisoners eat together in crowded dining rooms and share filthy and unsanitary bathrooms, all with virtually zero social distancing or the wearing of protective masks to avoid virus transmission. (See Ex. A and Ex. B, photographs of Orion RRC dining facilities at meal time, April 10, 2020 and common bathrooms, sleeping quarters, April 30, 2020). The prisoners are also forced to clean the facilities themselves. The halfway house does not provide adequate basic cleaning services. Further, the halfway house has failed to provide prisoners with the most basic supplies to clean their living areas or maintain the rigorous personal hygiene the CDC is urging, including most importantly masks and hand sanitizer, which is left to inmates own devices and expense to purchase.<sup>4</sup> The conditions

<sup>3</sup> Center for Disease Control, Interim Guidance on Management of Coronavirus Disease 2019 (COVID-19) in Correctional and Detention Facilities (March 23, 2020)

<sup>4</sup> At one point during the week of April 8<sup>th</sup> the facility passed out non-virus filtering surgical masks to residents, one per resident only, and told them that the “policy” was to wear the mask when going out for work or other ‘outside duties’. Many inmates are indigent and cannot afford to purchase masks, if you

maintained by Orion RRC make it impossible for the prisoners and pre-trial detainees housed there to avoid congregating in groups or practice social distancing, maintain the required hygiene and limit the high risk of spread of the COVID-19 virus. The BOP, through its designated contractor BSSW, cannot keep the prisoners safe from the COVID-19 pandemic while housing them in group bunk rooms and tight living quarters without adequate sanitation, and while providing little or no medical care.

Furthermore, the BOP has failed to provide even the most basic medical care during this health emergency. Orion House has failed to provide prompt medical attention and testing to those with COVID-19 symptoms, their solution being to send potentially afflicted residents to a neighborhood 'Urgent Care' facility that does not offer extensive COVID testing or diagnosis.<sup>5</sup> Orion does not have an on-site medical staff. Inmates at Orion House who are ill have been forced in recent days to call 9-1-1 themselves for help. The BOP's continued inaction gravely jeopardizes the safety and lives of all confined inmates and other members of the wider community and on-site staff.

Many of the people at Orion have been designated for home confinement by the BOP and are typically eligible for release on home confinement within 6 months of their release date. Sweeney has been designated for home confinement but staff at Orion (Case Manager Garrett) has resisted efforts to place him in such. The BOP via Orion House have refused to exercise their discretion to provide early release and significantly reduce the population in the facility, in particular with arbitrary and deliberate indifference toward Sweeney. Instead, the BOP and Orion have chosen to keep prisoners confined in tight quarters as the COVID-19 crisis

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can find them, on the outside market and go without completely. Communal hand sanitizer is sometimes left by the front check-out desk, but on an irregular basis. (See Ex. A, photographs of meal time, April 10, 2020).

<sup>5</sup> That location is: Valley Urgent Care, 15310 Roscoe Blvd. Panorama, City, CA 91402.

spreads like wildfire. The continued incarceration of Sweeney at Orion in conditions that contravene widely known health protocols is putting him, BSSW staff, and the broader community at great risk for infection, illness, or death due to the COVID-19 pandemic.

The CDC guidelines are incorporated in the guidelines published on March 20, 2020, by the American Jail Association.<sup>6</sup> These guidelines recommend reducing jail populations as soon as possible, including by releasing inmates when at all possible. The guidelines also state that any new prisoners should be screened for COVID-19, as should facility staff on a daily basis. The American Jail Association guidelines also implore correctional facilities to “provide free and readily available soap, hand sanitizer, and cleaning/disinfectant supplies for living areas.” The guidelines state to replenish those supplies frequently and eliminate rules that label the products contraband. The guidelines suggest adding additional hand washing stations. When discussing social distancing, the American Jail Association guidelines recommend serving food in housing units instead of having prisoners travel and congregate in dining halls. The guidelines also generally call for reducing activities that cause prisoners to congregate in large groups. Health experts have warned that there is an increased risk of contracting and transmitting COVID-19 when groups of people live, eat, and sleep in close proximity. In response to this guidance, jurisdictions around the world and in the United States have taken bold actions to save lives for inmates and for the community. Germany released “1,000 prisoners who are close to the end of their sentences”; Canada released “1,000 inmates in the state of Ontario”; and Iran “temporarily release[d] 85,000 prisoners, with 10,000 of them being granted pardons.”<sup>7</sup> The New Jersey

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<sup>6</sup> American Jail Association, Recommended Strategies for Sheriffs and Jails (March 20, 2020).

<sup>7</sup> Michael Nienaber et al., Lock 'Em Up or Let 'Em Out? Coronavirus Prompts Wave of Prisoner Releases, REUTERS, March 25, 2020.

Supreme Court announced that it would release “as many as 1,000 people from its jails”<sup>8</sup> and New York City is releasing more than 1,000 people from its jails.<sup>9</sup>

This effort to downsize facilities like prisons and jails, which are breeding grounds for the highly contagious virus, is not limited to the East Coast. It is an urgent nationwide effort. Cuyahoga County, Ohio, announced plans to rapidly release around 600 people from the county jail just two days after President Trump declared a national emergency; Washington County, Oregon, released more than 120 people from the local jail; Alameda County, California, released 314 people from their jail; the Iowa Department of Corrections began to release 700 people from state prisons; Mercer County, Pennsylvania, released 60 of 308 people in their jail.<sup>10</sup> Despite such actions around the country, and several mandates issued by the United States Attorney General to immediately “maximize placement in home confinement”<sup>11</sup>, the BOP and individual halfway house contractors have failed to act.

SWEENEY’S EIGHTH AMENDMENT RIGHT TO NOT BE SUBJECT TO CRUEL AND UNUSUAL PUNISHMENT IS BEING VIOLATED BY HIS CURRENT CONDITIONS OF CONFINEMENT-

Given the size of the current population inside Orion House and the structure of the living arrangements, the facility simply cannot provide the safety and COVID-19 protection that is constitutionally mandated for the defendant under the Eighth Amendment at this unprecedented time in American history. Sweeney therefore respectfully asks this Court for declaratory and injunctive relief, including requiring the BOP and its contractor, BSSW, to immediately release Sweeney from ALL remaining BOP custody pursuant to 28 U.S.C. §2241 or 18 U.S.C.

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<sup>8</sup> Tracey Tully, 1,000 Inmates Will Be Released From N.J. Jails to Curb Coronavirus Risk, N.Y. TIMES, March 23, 2020.

<sup>9</sup> NYC to Release More Than 1,000 Prison Inmates Due to Coronavirus Concerns, ASSOC. PRESS, March 25, 2020.

<sup>10</sup> Kimberly Kindy et al., ‘Disaster Waiting to Happen’: Thousands of Inmates Released as Jails and Prisons Face Coronavirus Threat, WASH. POST, March 25, 2020.

<sup>11</sup> <https://www.themarshallproject.org/2020/04/25/few-federal-prisoners-released-under-covid-19-emergency-policies>

§3582(c)(1)(A) and reduce his sentence accordingly to time-served with no modification in the term of supervised release such that he can be safely housed at his own residence in Los Angeles with immediate effect, while living under court imposed conditions of supervised release that are already in place.

Jurisdiction-

This Court has subject matter jurisdiction over the allegations presented herein pursuant to 28 U.S.C. § 1331 (federal question), 28 U.S.C. § 1346 (original jurisdiction), 28 U.S.C. §§ 2201-02 (declaratory relief), 28 U.S.C. § 2241 (habeas jurisdiction) and 18 U.S.C. § 3582(c)(1)(A) (Imposition of a Sentence of Imprisonment).

III. Sweeney's Confinement Conditions in the Orion RRC Halfway House-

The conditions in the Orion RRC Halfway House facility disregard all medical and public health directives for risk mitigation of viral infection. Orion does not encourage or practice social distancing in its facility. Furthermore, the structure and layout of Orion makes social distancing impossible. There are many opportunities for the virus to enter Orion RRC.

- a.) Although prisoners are currently not allowed to leave Orion (except for work, medical or other necessary functions), Orion still is admitting new prisoners. The CDC guidelines recommend screening for any new prisoners to detect potential COVID-19 symptoms.
- b.) Orion has admitted new individuals and prisoners without screening. This creates a heightened risk that the virus will be introduced into the facility.
- c.) Orion are not screening staff each day. This presents a daily risk of introduction of the virus into the facility.

- d.) On March 20, 2020, Orion issued a shelter in place order for all prisoners. This order has exacerbated crowded conditions at Orion, because all of the prisoners must stay in the facility at all times. Prisoners in Orion live in close quarters and cannot achieve the “social distancing” needed to effectively prevent the spread of COVID-19. Prisoners in Orion share rooms, common areas, dining areas and bathrooms daily. The CDC recommended that correctional facilities provide no-cost access to soap, running water, and tissues to all prisoners. Prisoners in Orion have limited access to hot water, soap, disinfectants, gloves, and masks, and very often facilities are in a state of disrepair (See Ex. B, bathroom/toilet condition, Orion House, photo 4/30/2020). Orion has not provided hygiene and cleaning supplies to people incarcerated there. Prisoners are responsible for purchasing their own hygiene supplies, but there is no commissary at the facility. Since the lockdown of the facility began on March 20, 2020, prisoners have to rely on family, if they have family in the area, to drop off hygiene supplies.
- e.) Hallways also pose risks of contagion: prisoners share the hallways, and everyone, including quarantined individuals, use the hallway to access services. Orion’s dining facilities preclude the CDC-recommended social distancing and increase transmission opportunities. Prisoner’s at Orion eat meals in large groups of about 10-15 people at any given time. Five people must sit at each of five or six rectangular tables, which are approximately 5 feet in length. People eat from open trays in these crowded spaces. Additionally, prisoners take their plastic ware from an open communal box and pour their drinks from an open container of Kool-Aide.
- f.) Currently there is no isolation protocol in place for any prisoner living at Orion suspected of contracting the Corona virus/COVID-19. Further Orion has not educated prisoners on

ways to minimize community spread of COVID-19. Orion does not have on-site medical staff. Prisoners receive medical treatment only if they are sent by ambulance to a hospital or by themselves to an area Urgent Care center. Orion has not informed the population of any protocol for isolating symptomatic prisoners.

g.) These crowded conditions, in both sleeping and social areas, and the shared (filthy) bathrooms, maximize the likelihood that COVID-19 will spread rapidly across the facility, infecting vulnerable detainees. The conditions in Orion RRC are dire. They are contrary to CDC guidance and BOP guidelines. The facility has created a significant and immediate risk of spreading COVID-19, putting Sweeney's health and life in danger.

Defendant Sweeney Has A Constitutional Right to Reasonable Safety in Confinement-

The Eighth Amendment prohibits cruel and unusual punishments. U.S. Const. Amend. VIII. The government has an affirmative duty to provide conditions of reasonable health and safety to a defendant when it detains or incarcerates them. *Brown v. Plata*, 563 U.S. 493, 510-11 (2011). The reach of the Eighth Amendment includes "exposure of inmates to serious communicable disease." *Helling v. McKinney*, 509 U.S. 25, 33 (1993). The Eighth Amendment requires that "inmates be furnished with ... reasonable safety and the Supreme Court has explicitly recognized that the risk of contracting "serious contagious diseases" may constitute such an "unsafe, life-threatening condition" that it threatens reasonable safety." *Id.* A potential COVID-19 outbreak poses a substantial risk of serious harm to every person housed in Orion House. The risk of exposure to COVID-19 constitutes a serious risk to health and life. Under the current conditions at Orion, the BOP and its designated contractor BBSW have not and cannot

protect Sweeney from the risk of this serious harm. The BOP and BBSW have acted with deliberate indifference to the needs of the defendant, by, *inter alia*:

- a. Ignoring conditions that are very likely to cause serious illness such as: crowded dining rooms, crowded sleeping quarters, lack of access to cleaning products, filthy and unhygienic bathrooms in state of disrepair, lack of access to products to maintain personal hygiene, no social distancing.
- b. Ignoring CDC and BOP guidelines about posting signage to educate prisoners about COVID-19, its symptoms, and preventative measures.
- c. Ignoring CDC guidelines and professional guidance to create social distance of about six feet between persons to help stop the spread of COVID-19.
- d. Continuing to admit new prisoners.
- e. Failing to test newly admitted individuals.
- f. Failing to screen prisoner personnel as they enter the facility on a daily basis.
- g. Not having an on-site medical staff to address health concerns as they arise during a global pandemic.

The Bureau of Prisons and BBSW/Orion House Have Breached Their Duty of Care Owed to Defendant Sweeney Resulting in Harm-

As penal authorities, the BOP and its assigned agents and contractors owe a duty to provide reasonable care to the prisoners in their protection and safekeeping. *Matthews v. District of Columbia*, 387 A. 2d 731, 734 (D.C. Cir.). Both the BOP and its designated contractor knew of the dangers associated with COVID-19 and failed to mitigate the risks. The BOP issued guidance to their facilities on how to deal with COVID-19, of which few, if any, have been adequately followed.<sup>12</sup> The BOP and its contractor have breached that duty by, *inter alia*, failing

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<sup>12</sup> See: <https://www.themarshallproject.org/2020/04/25/few-federal-prisoners-released-under-covid-19-emergency-policies>. In another instance, the BOP's own staff have filed suit against it for not adhering to

to provide care consistent with directives from the CDC and BOP. For example, Orion failed to:

- a. Provide prisoners with the opportunity to practice social-distancing, including by staggering meal times, or confining people who are symptomatic of COVID-19. Orion continues to feed 25-30 prisoners at a time in a common area. Prisoners have to sit five or more to a table. The tables only have a two foot diameter making it impossible for the recommended six feet for social distancing. Prisoners have to sleep in bunk beds that are very close together (see Exhibits A and B, ~~Sweeney~~ bunk is the one on top, the one below is occupied by a convicted offender who exhibits symptoms of COVID-19, including dry cough, fatigue, and frequent feverish conditions).
- b. Provide sanitary conditions and supplies to maintain good hygiene.
- c. Stop admitting new prisoners or at the very least screen incoming prisoners for COVID-19 symptoms before admission.
- d. Screen Orion staff as they enter the facility on a daily basis.
- e. Follow CDC and BOP guidelines about posting signage to educate prisoners about COVID-19, its symptoms, and preventative measures.
- f. Have medical staff on-site to address health concerns as they arise during a global pandemic.

Orion's failures have caused Sweeney to suffer increased risk of harm and have increased the threat from existing conditions for imminent sickness and death due to COVID-19.

IV. CONCLUSION-

COVID-19 Presents A Serious Risk of Harm And Imminent Death To the Defendant And His Present Conditions of Confinement Violate the Eighth Amendment-

Outcomes from COVID-19 vary from asymptomatic infection to death. Some individuals who contract the disease may experience mild symptoms, while others may suffer respiratory failure and death. People with pre-existing medical conditions, such as asthma, kidney disease, heart disease, obesity, and diabetes, are at an increased risks of having- serious complications if they contract COVID-19. In the highest risk populations, the fatality rate is about 15 percent, meaning that out of 100 vulnerable people infected, fifteen (or approximately 1 in 7) will die. Those who do not die may experience long-term harm. COVID-19 can severely damage lung tissue, which requires an extensive period of rehabilitation, and in some cases, can cause a permanent loss of respiratory capacity. Research shows that avoiding groups and social distancing is a critical means of risk mitigation. Distancing must occur before individuals display symptoms, as they may be contagious before they are symptomatic. The CDC recommends a social distance of at least 6 feet to minimize the risk of spread. This CDC guidance extends this to correctional facilities: prisoners' beds should be at least 6 feet apart. Given the nature of congregation in detention facilities, there is an increased risk that COVID-19, a highly contagious disease, will spread more quickly to a larger number of people. Other courts across the country have already recognized that the risk of spreading the virus in jail is "palpable" and the risks overburdening the healthcare resources of the facilities and surrounding communities. Given this inherent danger, courts around the country, including other Federal Circuits, have

released people from incarceration due to concerns about COVID-19.<sup>13</sup> Sweeney respectfully prays here (literally) that this Court join other courts across the country and world and subject to the provisions under its authority pursuant to 28 U.S.C. §2241 or 18 U.S.C. §3582(c) militating the relief requested herein and that his MOTION be ALLOWED. Sweeney has an ex-wife, a five-year old son, an ailing parent who is sequestered without mobility or resources and a job offer waiting in the area as soon as social distancing protocols are lifted. He has every reason to live, as do the others who depend on him significantly in their lives, none of whom he has been able to see in person due to his current confinement location and the risks its presents for COVID contamination.

Based on the foregoing reasons and fact Sweeney respectfully asks this court for declaratory and injunctive relief, including requiring the BOP and its contractor, BSSW, to immediately release Sweeney from ALL remaining BOP custody pursuant to 28 U.S.C. §2241 or 18 U.S.C. § 3582(c)(1)(A) and reduce his sentence accordingly to time-served with no modification in the term of supervised release such that he can be safely housed at his own residence in Los Angeles with immediate effect, while living under court imposed conditions of supervised release that are already in place.

Respectfully submitted,

Daniel Sweeney



<sup>13</sup> 106 people who were incarcerated on Rikers Island for Technical Parole Violations were ordered to be released on March 27, 2020 (see [https://legalaidnyc.org/wpcontent/uploads/2020/03/03-27-20-Secures-Release-of-106-Incarcerated-New-Yorkers-at-a-high-risk-of-COVID-19-from-Technical-Parole-Violation-Holds-on-Rikers-Island.docx.pdf?fbclid=IwAR3lvbeyQ1BdlVdnwjsZjVd\\_S71X06ppuQAYGK2vUj7n2XpOa5URMPyZfQ](https://legalaidnyc.org/wpcontent/uploads/2020/03/03-27-20-Secures-Release-of-106-Incarcerated-New-Yorkers-at-a-high-risk-of-COVID-19-from-Technical-Parole-Violation-Holds-on-Rikers-Island.docx.pdf?fbclid=IwAR3lvbeyQ1BdlVdnwjsZjVd_S71X06ppuQAYGK2vUj7n2XpOa5URMPyZfQ)); A defendant with a history of gun and drug charges was released to home confinement due to concerns related to COVID-19 spread. U.S. v. Jaffee, No. 19-cr-88-RDM (D.D.C. Mar. 26, 2020); A defendant convicted of child pornography charges was released to home confinement due to concerns related to COVID-19 spread. U.S. v. Harris, No.19-cr-356-RDM, Dkt. No. 36 (D.D.C. Mar. 26, 2020).

Respectfully submitted,

*Daniel Sweeney*



5/6/20

/s/ Daniel Sweeney, pro se (in-custody)  
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Dated: May 6, 2020, filed via MAIL-

Certificate of Service

I hereby certify that this document was filed via US MAIL ON 5/7/2020 to the Clerk of the U.S. District Court for the Central District of California, and I am a party to this proceeding. Electronic copies were filed with participants via ECF who are registered for service.  
/s/ Daniel Sweeney, pro se