

EXHIBIT A

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
HARTFORD, CONNECTICUT**

In the Matter of:)

MARK REID,)
Respondent)

File No.: A 035 973 579

In removal proceedings)

January 26, 2013

**DECLARATION OF MARK REID IN SUPPORT OF HIS APPLICATION
FOR RELIEF UNDER THE CONVENTION AGAINST TORTURE AND
TERMINATION OF PROCEEDINGS**

I, MARK REID, upon my personal knowledge, and in accordance with 28 U.S.C. § 1746,
declare as follows:

1. My name is Mark Anthony Reid.
2. My date of birth is [REDACTED] 1964. I was born in Kingston, Jamaica, but I have been living in the United States for the past 34 years.
3. I am afraid of being deported to Jamaica [REDACTED] I fear for my life if I am forced to go back there. I know people in Jamaica [REDACTED]
4. My mother's name is Beverly Pryce. She is a naturalized citizen of the United States, and she lives in Hollywood, Florida, where she works as a nurse.
5. My father's name is Reginald Reid. I do not know where he lives or if he is still alive. I believe he moved to the United States and became a citizen, but I am not sure.
6. I have a sister, Jaime Pryce, who lives in Hollywood, Florida with my mother. She is a United States citizen. My mother adopted her in 1988 or 1989. She is now 24 years old.
7. I also have many cousins and other relatives who live in the United States and are U.S. citizens.
8. My mother and sister are observant Seventh Day Adventists. The rest of my family is also Seventh Day Adventists.

CHILDHOOD IN JAMAICA

9. My mother emigrated from Jamaica to the United States for work when I was very young. I believe I was less than two years old when she left – I have no memory of being with my mother prior to her bringing me to the United States when I was 14 years old.
10. I knew my father growing up, but we lost touch 15 or 20 years ago. He did not live with me when I was growing up.
11. After my mother left Jamaica, I lived with my grandmother, who I called “mama,” and with my maternal cousins and other relatives in Kingston, Jamaica.
12. When I was eight or nine we moved to Spanish Town, Jamaica. My uncles and grandmother had a property there where they planned to build a house. At first we lived in a hut on the property while they started to build the house. Spanish Town was very poor and we did not have electricity or running water when I first moved there. Many kids would walk to school barefoot and bathe in the river. I attended the local school, Tredegar Park.
13. There was no police station where we lived. You would have to cross the river to get to the police station. People in the town would take justice into their own hands. I remember a group of people once waited with machetes for a robber who had been stealing from a store in the neighborhood. When he arrived, they chopped off his hand. They hacked him up badly. When the police arrived, they loaded the dead man’s body into a bag and told the people who had killed him “good job.”
14. When I was younger than ten years old, [REDACTED]
[REDACTED]
[REDACTED]
15. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
16. When I was still a young boy, my mother sent me a plastic duck as a gift from the United States. I treasured it. I was very upset that this was all I had from her, and clung to that toy. My grandmother kept it for me so it wouldn’t get lost or ruined. [REDACTED]
[REDACTED]
[REDACTED]
17. [REDACTED]
[REDACTED]
[REDACTED]

18. At first I didn't tell anyone about [REDACTED] because I was scared and did not know what was happening. After a few months, I told my grandmother, [REDACTED]
[REDACTED]
19. I felt helpless, like I had no voice and nobody could hear me. I felt like I was muzzled.
20. When I was about 11 or 12, a neighborhood boy who I went to school with [REDACTED]
[REDACTED]
21. [REDACTED] other children in the neighborhood and at school began harassing me. [REDACTED]
[REDACTED]
22. This harassment became violent. I was beaten many times by the other children and lived in constant fear. One time, a group of eight or nine children in the neighborhood cut me [REDACTED] and tried to drown me in the Rio Cobre river because [REDACTED]
[REDACTED] I still have a several inch long scar. I could not go to school for a while afterwards
[REDACTED]
23. Another time, children chased and hit me with the large batteries that people in the neighborhood kept for big flashlights. I was constantly afraid of being attacked so I would race home from school.
24. The teasing made me feel worthless. Sometimes the teasing hurt me even more than the physical harassment. I had been a champion athlete at school, a track star, and they took all that away.
25. [REDACTED] I would spend a lot of time in my uncle Melford's room. He had a recurring ulcer on his foot that would get infested with maggots and smelled really bad. He was often bed-ridden. Everyone else would avoid him, so I would go to his room to be safe.
26. My father was a police officer in Jamaica. He told my grandmother that if I ever got into any trouble he would kill me himself.
27. I felt abandoned because no one was protecting me and I couldn't stop [REDACTED] or the attacks.
28. Eventually, my mother brought me to the United States to live with her in New Jersey. I was 14 years old at the time.

CHILDHOOD IN THE UNITED STATES

29. In 1978, when I was fourteen years old, I entered the United States as a Lawful Permanent Resident. I have lived in the United States ever since. I first lived with my

mother and stepfather in Roselle, New Jersey. They later divorced and my mother and I moved to Plainfield, New Jersey.

30. My teenage and early adult years are a jumbled period in my memory. My mother was moving a lot and I switched schools almost every semester. I have trouble remembering dates during this period.
31. Shortly after I arrived in New Jersey, my uncle Melford died. My mother and I went back to Jamaica for a couple of days to go to his funeral.
32. I began high school in New Jersey, and had some difficulties in school. After I came to live with my mother in the United States, I grew increasingly angry with her. I blamed her for [REDACTED] This anger hurt my relationship with my mother and interfered with my schooling.
33. I did not have many friends in high school. I was scared of my peers because of my experiences in Jamaica. It was hard for me to trust my classmates in high school. Also, I still had a Jamaican accent and other students picked on me for it. My anger and distrust contributed to several fights while I was in high school. These incidents made my relationship with my mother even worse.
34. I was suspended from Plainfield High School after a fight. I ran away to live with my uncle Mark (his legal name is Murvelle, but people called him Mark) in New Haven, Connecticut. I was close to my uncle Mark. I believe he knew about [REDACTED]
35. By then, my mother had moved to Florida. She didn't understand why I was struggling and yelled at me a lot. Our relationship was very poor.
36. 31. My mother came to New Haven to get me and brought me to live with her in St. Petersburg, Florida.
37. 32. I enrolled in high school there, but soon dropped out. Later I enrolled in the Tomlinson Adult Education Center where I got my GED.
38. 33. Before I got my GED my mother moved to Fort Lauderdale. I did not want to go with her, and so I stayed in St. Petersburg. Initially, I lived with a family we knew from church. They charged me \$75 a week to live there. I ran out of money and ended up living by myself for about a week in an abandoned house in St. Petersburg.
39. 34. In the early 1980s I injured my knee playing pick-up football. I did not go to the hospital right away because I did not have money and thought you could not go to the hospital without insurance. I was living in the abandoned house at the time.
40. 35. After a couple of days I went to the hospital. My knee required surgery. I needed help to recuperate from the surgery, but I had no place of my own and nobody to help care for

me. I called my uncle George in New York, but he would not allow me near his children

[REDACTED]

41. 36. Nobody in the United States was willing help me recover from my surgery. My uncle George sent me to recover in Jamaica. This was the second and final time I ever went to Jamaica.

42. 37. I was scared to be back in Jamaica. I was terrified that I would be [REDACTED] like I was as a kid. I stayed in my grandmother's house when I first got there. A few people in the neighborhood recognized me, and they threw rocks at the house and yelled [REDACTED] I was then sent to my father's house in Kingston. Even there, I was too scared to go outside. I stayed in Jamaica for four or five months until I recovered.

43. 38. When I left Jamaica, I moved to New Haven, Connecticut, to work for my uncle Mark in construction.

ADULTHOOD

44. 39. Since receiving my GED, I have had some post-secondary education and training in business administration, paralegal skills, and criminalistics, though I did not graduate from these programs. I earned a certificate in asbestos removal and a loan originator certificate from Walters and Associates also in New Haven, Connecticut.

45. 40. Other than the times I have been incarcerated, I have lived in New Haven almost continuously for nearly the past thirty years. I left New Haven briefly in the mid-1990s to live with my mother in Florida for about two years.

46. 41. In 1984, I joined the United States Army Reserve, and served until 1990, when I was honorably discharged. I did boot camp at Fort Benning, Georgia, with the US Army, Sixth Battalion, First Infantry Training Brigade, where I was specially trained in marksmanship and hand grenades, and received some training as an anti-armor specialist. Following boot camp, I was stationed with the US Army Reserve, Third Battalion/35th Infantry in Springfield, Massachusetts.

47. 42. I decided to enlist when I went with my uncle Mark and cousin Anthony to apply for citizenship in downtown in New Haven at the post office. A military recruiter standing in front of the recruiting center across the street struck up a conversation with me and told me that if I enlisted the military would take care of getting me citizenship.

48. 43. I joined the military because I wanted to be a part of something. I wanted to be somebody. I wanted to serve my country. I was willing to die for my country. I took an oath to defend the Constitution of the United States, similar to the one the President takes when he is sworn into office.

49.

44. Citizenship was an added benefit of enlisting in my mind. The recruiter and I did not talk about the process in detail, but I was left with the impression that if I served I would automatically become a citizen. The topic of citizenship never came up again during my years in the service. Citizenship was never a topic of conversation in my home. My mother had never discussed it with me when I was growing up. I think of myself as an American.

50.

45. Because of what the military recruiter promised me, I believed I had become a U.S. citizen after I was honorably discharged from the Reserves. I also learned about derivative citizenship in the 1990s. My understanding was that anyone who came into the country with their parent before the age of 16 was a citizen. Either through my mother or through my military service, or both, I thought for sure I had become a citizen. I did not realize that I was not a citizen until I was up for parole from my sentence in Connecticut and I learned that I had an ICE detainer, and that I am not a U.S. citizen and can be deported.

51.

46. While I was in the Reserves I worked in construction and at Wendy's. Since leaving the Reserves, I have worked in construction, in asbestos removal, and as a loan originator. I worked at both Walters & Associates in New Haven, Connecticut and Liberty Mortgage in Milford, Connecticut. More recently, the majority of my income came from the four residential rental properties I owned, managed, and rented in New Haven. I was able to make enough money in asbestos removal to put a down payment on my first property in 1998 or 1999. I made good money as a loan originator and was able to buy more properties. Since being incarcerated I have lost my rental properties to foreclosure.

52.

47. I have two children, [REDACTED] who are both United States citizens.

53.

48. I am very proud of my son [REDACTED] was born on [REDACTED]. He graduated from Hillhouse High School in New Haven, Connecticut. He recently graduated from the University of Maryland in Baltimore and I understand that he is now planning to enlist in the United States Navy.

54.

49. My daughter [REDACTED] and I have a close relationship. She was born on [REDACTED]. She lives in New Haven, Connecticut with her mother [REDACTED]. She went to the [REDACTED] where she played field hockey. Since I have been incarcerated, we have not been able to communicate as much as I would like, but I want very much to be involved in her life again. We had a tight bond when she was little, and I miss her.

55.

49. I began using powder cocaine in the 1980s. At the time I began using illegal drugs I was very angry and was making poor decisions. I was struggling to come to terms with the [REDACTED]. Since then, I have been arrested several times and incarcerated four times for drug-related offenses. I have also been arrested for other crimes including property crimes, non-gun weapon offenses, and a domestic dispute.

56. 50. Around 2000 or 2001, I was stabbed in the stomach by a relative of people I was renting to at a house on Howard Avenue, in New Haven. They were horrible tenants and I was in the process of evicting them. The grandson of one of the main tenants [REDACTED] He asked me [REDACTED] and I told him to mind his own business. The next day his cousin came around [REDACTED] We got into an argument and he stabbed me in the stomach. I think he came after me because he was mad about his family getting evicted, and he thought he could [REDACTED]

57. 50. I had multiple surgeries as a result of the stabbing. I began using heroin to manage the pain that I continued to experience. My heroin use led to my most recent incarceration.

58. 52. In 2001, I underwent substance abuse treatment at the Apt Foundation in New Haven, Connecticut. Unfortunately, the pain related to the many surgeries I had as result of being stabbed in the stomach made it difficult for me to stay clean.

59. 53. While I was most recently in prison, I took a course about how crimes affect their victims, entitled "Thinking for a Change," which helped me to see the impact of my mistakes on others. The class helped me to think about how my choices have affected my quality of life and other people.

60. 54. I do not want to return to the life I was leading before I was incarcerated. I have asked God for forgiveness for my mistakes. I have also asked him for the strength to rebuild my life.

61. 55. I am working on making connections with others and being honest about my past mistakes. I want to go back to school and to get back into real estate. I welcome this opportunity to live a better life. Because of everything I have been through I have become more sympathetic to others. [REDACTED] I am ready to seize this moment and lead a better life. I want to set a better example for my daughter.

62. 56. I have also benefitted from the support of Reverend Josh Pawelek, a Unitarian Universalist minister I met while incarcerated. He met with me once at Brooklyn Correctional and we have written letters and talked on the phone. I was worried that [REDACTED]

63. 57. It was during my time in the service [REDACTED]

64. 58. Many years passed [REDACTED] That was very hard for me. [REDACTED] many of my family members [REDACTED] including [REDACTED]

my mother and sister. [REDACTED]
[REDACTED]
[REDACTED]

65.

59. I had [REDACTED]
[REDACTED]
[REDACTED]

66.

60. [REDACTED] in Springfield, Massachusetts when I was there for Reserves duty. [REDACTED]
[REDACTED]

67.

61. In the early 1990s, [REDACTED]
[REDACTED]
[REDACTED]

68.

62. [REDACTED] was killed in an altercation with the police in New Haven in January of 1992. The night before [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

69.

63. [REDACTED]
[REDACTED]

70.

64. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

71.

65. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

72.

66. [REDACTED]
[REDACTED]

73.

67. [REDACTED]
[REDACTED]

74.
68. [REDACTED]

75.
69. [REDACTED]

76.
70. [REDACTED]

77.
71. [REDACTED]

78.
72. [REDACTED]

79.
73. [REDACTED]

FEAR OF JAMAICA

80. 75. I have not returned to Jamaica since my knee injury. I no longer have relatives or friends in Jamaica. They have all either passed away or moved to the United States. I don't know anyone there. I have no connection to the country, and do not know how to navigate that culture.

81. 74. Based on my personal experiences in Jamaica as a child and information I have received [REDACTED]

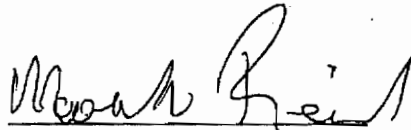
82. 75. Facing deportation has brought back painful memories of my childhood in Jamaica. I had tried not to think about what happened to me so that I could move on and not constantly feel the pain, sadness, and anger of that time of my life. In ICE detention I have been

having night terrors about the time [REDACTED] I have also been getting headaches that I think are brought on from all the anxiety of this experience.

83. 76. It is very hard for me to talk about [REDACTED] I have experienced. [REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] I am now trying to deal with these feelings so that I can heal, and find a way to healthily cope with my past. I never had the opportunity to speak to a professional about this before. I am now dealing with these emotions in a responsible way so that I can make better decisions in the future.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.


Mark Reid

Executed: Plymouth, Massachusetts
January 26, 2013

EXHIBIT B

Requested by: A.LITTMAN/NH

Date of Report: 11/16/2012 Page: 1

CT DEPT OF EMERGENCY SERVICES AND PUBLIC PROTECTION
 STATE POLICE BUREAU OF IDENTIFICATION
 1111 COUNTRY CLUB RD
 MIDDLETOWN, CT. 06457

SPBI/SID#: CT00464733 {CONVICTED FELON} Inmate#: 00141754
 FBI#: 629366EA7 III Status/Date: M 11/13/2012
 Sex: M Race: B Height: 5' 8" Weight: 240 Hair: BLK Eyes: BRO
 Henry FPC: 031W00013 I28WII014 Place of Birth: JAMAICA, FC

20-Arrest Date: 10/22/2009 Agency: NEW HAVEN Case#: 09-63695
 Disp Date: 07/07/2010
 Dkt: N23N-CR09-0098432-S UAR:08235518
 Name: REID, MARK A DOB: 04/07/1964
 Addr: 79 NORTON STREET, NEW HAVEN, CT 06511
 FV?: ALC?: NAR?: Y CDL?: CV?: HM?:
 Bond: \$50000 (TERM) Detained at: LLU FP SUPPORTED?: Y
 Chrg 1-SALE ILLGL DRUG(21a-278(b)) (FEL -U) 1 CT(S)
 CONDITIONAL DISCHARGE
 12YR JAIL, 5YR TO SERVE, 5YR COND DISCH
 Offense Occurrence Date: 10/13/2009 Verdict Date: 07/07/2010

19-Arrest Date: 10/06/2009 Agency: WEST HAVEN Case#: 08-04272
 Disp Date: 07/07/2010
 Dkt: A22M-CR09-0071860-S UAR:07713490
 Name: REID, MARK A DOB: 04/07/1964
 Addr: 79 NORTON ST, NEW HAVEN, CT 06511
 Bond: \$50 (TERM) Detained at: BPT FP SUPPORTED?: N
 Chrg 1-BURGLARY 3 (53a-103) (FEL -D) (CONSP) 1 CT(S)
 1YR JAIL, CONCUR
 Offense Occurrence Date: 11/29/2008 Verdict Date: 06/02/2010

18-Arrest Date: 09/18/2008 Agency: WEST HAVEN Case#: 08-4507
 Disp Date: 07/07/2010 Rearrest Date: 04/28/2009
 Dkt: F02B-CR08-0236071-S UAR:08983754
 Name: REID, MARK DOB: 04/07/1964
 Addr: 79 NORTON STREET, NEW HAVEN, CT 06511
 Bond: \$500 (PRFS) FP SUPPORTED?: Y
 Chrg 1-FLR TO APPEAR 1(53a-172) (FEL -D) 1 CT(S)
 1YR JAIL, CONCUR
 Offense Occurrence Date: 02/06/2009 Verdict Date: 07/07/2010

17-Arrest Date: 04/29/2004 Agency: NEW HAVEN Case#: 04 23485
 Disp Date: 08/25/2004 VOP Date: 07/07/2010
 Dkt: N23N-CR04-0029589-S UAR:08206002
 Name: REID, MARK DOB: 04/07/1964
 Addr: 43 45 DAYTON ST, 2ND FL, NEW HAVEN, CT 06515
 FV?: ALC?: NAR?: Y CDL?: CV?: HM?:
 Bond: \$500000 (TERM) Detained at: LLU FP SUPPORTED?: Y
 Chrg 1-POSS NARCOTICS (21a-279(a)) (FEL -U) 1 CT(S) (ORIG)
 SALE HLCGN/NARC(21a-277(a)) (FEL -U) 1 CT(S) (SUB)
 CONDITIONAL DISCHARGE
 7YR JAIL, 4YR TO SERVE, CONCUR, 3YR COND DISCH
 Offense Occurrence Date: 04/29/2004 Verdict Date: 08/25/2004
 1-POSS NARCOTICS (21a-279(a)) (FEL -U) 1 CT(S) (ORIG)
 SALE HLCGN/NARC(21a-277(a)) (FEL -U) 1 CT(S) (SUB)
 PROBATION TERMINATED

Requested by: A.LITTMAN/NH

Date of Report: 11/16/2012 Page: 2

CT DEPT OF EMERGENCY SERVICES AND PUBLIC PROTECTION
 STATE POLICE BUREAU OF IDENTIFICATION
 1111 COUNTRY CLUB RD
 MIDDLETOWN, CT. 06457

SPBI/SID#: CT00464733 {CONVICTED FELON}

Inmate#: 00141754

Offense Occurrence Date: 04/29/2004 Verdict Date: 07/07/2010

16-Arrest Date: 08/13/2003 Agency: NEW HAVEN Case#: 41392
 Disp Date: 08/25/2004 VOP Date: 07/07/2010
 Dkt: N23N-CR03-0020231-S UAR:08200248
 Name: REID, MARK DOB: 04/07/1964
 Addr: 630 HOWARD AVE, NEW HAVEN, CT 00000
 Bond: \$49900 (SET) Detained at: LLU FP SUPPORTED?: Y
 Chrg 1-SALE ILLGL DRUG(21a-278(b)) (FEL -U) (CONSP) 1 CT(S) (ORIG)
 SALE HLCGN/NARC(21a-277(a)) (FEL -U) (CONSP) 1 CT(S) (SUB)
 CONDITIONAL DISCHARGE
 7YR JAIL, 4YR TO SERVE, CONCUR, 3YR COND DISCH
 Offense Occurrence Date: 08/13/2003 Verdict Date: 08/25/2004
 1-SALE ILLGL DRUG(21a-278(b)) (FEL -U) (CONSP) 1 CT(S) (ORIG)
 SALE HLCGN/NARC(21a-277(a)) (FEL -U) (CONSP) 1 CT(S) (SUB)
 PROBATION TERMINATED
 Offense Occurrence Date: 08/13/2003 Verdict Date: 07/07/2010

15-Arrest Date: 05/16/2003 Agency: WEST HAVEN Case#: 03-14890
 Disp Date: 05/28/2004 Rearrest Date: 11/20/2003
 Dkt: A22M-MV03-0031988-S UAR:01427371
 Name: REID, MARK A DOB: 04/07/1964
 Addr: 630 HOWARD AVE, NEW HAVEN, CT 00000
 Bond: \$1000 (PRFS) FP SUPPORTED?: Y
 Chrg 1-FLR TO APPEAR 2(53a-173*) (MISD-A) 1 CT(S)
 UNCONDITIONAL DISCHARGE
 Offense Occurrence Date: 08/21/2003 Verdict Date: 04/15/2004

14-Arrest Date: 02/22/2002 Agency: WEST HAVEN Case#: 1544 02
 Disp Date: 06/06/2002 VOP Date: 05/28/2004
 Dkt: A22M-CR02-0044764-S UAR:01323126
 Name: REID, MARK A DOB: 04/07/1964
 Addr: 674 HOWARD AVE, NEW HAVEN, CT 00000
 Bond: \$25000 (PRFS) FP SUPPORTED?: Y
 Chrg 1-POSS NARCOTICS (21a-279(a)) (FEL -U) 1 CT(S)
 5YR JAIL, 1YR TO SERVE, 3YR PROB
 Offense Occurrence Date: 01/16/2002 Verdict Date: 06/06/2002
 2-PROBATION VIOL (53a-32) (MISD-U) 1 CT(S)
 30MO JAIL
 Offense Occurrence Date: 11/20/2003 Verdict Date: 04/15/2004
 1-PROBATION VIOL (53a-32) (MISD-U) 1 CT(S)
 30MO JAIL
 Offense Occurrence Date: 11/20/2003 Verdict Date: 04/15/2004

13-Arrest Date: 07/06/1998 Agency: NEW HAVEN Case#: 27384
 Disp Date: 03/29/2000 Rearrest Date: 01/17/2000

Requested by: A.LITTMAN/NH

Date of Report: 11/16/2012 Page: 3

CT DEPT OF EMERGENCY SERVICES AND PUBLIC PROTECTION
 STATE POLICE BUREAU OF IDENTIFICATION
 1111 COUNTRY CLUB RD
 MIDDLETOWN, CT. 06457

SPBI/SID#: CT00464733 {CONVICTED FELON}

Inmate#: 00141754

Dkt: N06N-CR98-0469393-S UAR:00986356,08157870,08162264,08164532

Name: REID, MARK

DOB: 04/07/1964

Addr: 240 SHEFFIELD AVE, NEW HAVEN, CT 00000

FV?: Y ALC?: NAR?: CDL?: CV?: HM?:

Detained at: LLU FP SUPPORTED?: Y

Chrg 1-ASSAULT 3 (53a-61) (MISD-A) 1 CT(S)

1YR JAIL, 1YR SUSP, CONSEC, 2YR PROB

Offense Occurrence Date: 07/06/1998 Verdict Date: 03/29/2000

2-FLR TO APPEAR 2(53a-173) (MISD-A) 1 CT(S)

1YR JAIL, 1YR SUSP, 2YR PROB

Offense Occurrence Date: 09/29/1998 Verdict Date: 03/29/2000

3-FLR TO APPEAR 2(53a-173) (MISD-A) 1 CT(S)

1YR JAIL, 1YR SUSP, CONCUR, 2YR PROB

Offense Occurrence Date: 09/29/1998 Verdict Date: 03/29/2000

12-Arrest Date: 07/06/1998 Agency: NEW HAVEN Case#: 41830

Disp Date: 07/28/1999 Rearrest Date: 05/30/1999

Dkt: N06N-MV98-0366242-S UAR:08157870,00225426

Name: REID, MARK

DOB: 04/07/1964

Addr: 240 SHEFFIELD AVE, NEW HAVEN, CT 00000

Detained at: LLU FP SUPPORTED?: Y

Chrg 1-UND SUSPENSION (14-215) (MISD-U) 1 CT(S)

CONDITIONAL DISCHARGE

30DY JAIL, 30DY SUSP, 1YR COND DISCH

Offense Occurrence Date: 07/06/1998 Verdict Date: 07/28/1999

2-FLR TO APPEAR 2(53a-173*) (MISD-A) 1 CT(S)

UNCONDITIONAL DISCHARGE

Offense Occurrence Date: 10/29/1998 Verdict Date: 07/28/1999

11-Arrest Date: 05/21/1997 Agency: HAMDEN Case#: 97041538

Disp Date: 02/20/1998 Rearrest Date: 12/04/1997

Dkt: N07M-CR97-0180992-S UAR:00719656,00819728,00813820

Name: REID, MARK

DOB: 04/07/1964

Addr: 436 SHELTON AVE, HAMDEN, CT

Bond: \$500 (SET) Detained at: LLU FP SUPPORTED?: Y

Chrg 1-RCKLES ENDNGR 2(53a-64) (MISD-B) 1 CT(S)

6MO JAIL, 6MO SUSP, 2YR PROB

Offense Occurrence Date: 05/21/1997 Verdict Date: 02/20/1998

10-Arrest Date: 02/18/1997 Agency: HAMDEN Case#: 94206853

Disp Date: 02/20/1998 Rearrest Date: 12/04/1997

Dkt: N07M-CR97-0179192-S UAR:00719912,00189192

Name: REID, MARK A

DOB: 04/07/1964

Addr: 434B SHELTON AVE, NEW HAVEN, CT

Bond: \$500 (SET) Detained at: LLU FP SUPPORTED?: Y

Chrg 1-WPN IN MTR VEH (29-38) (FEL -U) 1 CT(S)

\$350 FINE

Offense Occurrence Date: 02/18/1997 Verdict Date: 02/20/1998

Requested by: A.LITTMAN/NH

Date of Report: 11/16/2012 Page: 4

CT DEPT OF EMERGENCY SERVICES AND PUBLIC PROTECTION
STATE POLICE BUREAU OF IDENTIFICATION
1111 COUNTRY CLUB RD
MIDDLETOWN, CT. 06457

SPBI/SID#: CT00464733

{ CONVICTED FELON }

Inmate#: 00141754

9-Arrest Date: 02/01/1997 Agency: NEW HAVEN Case#: 6870
Disp Date: 06/11/1997
Dkt: N06N-CR97-0443995-S UAR:00775612
Name: REID, MARK DOB: 04/07/1964
Addr: 723 ELM ST, NEW HAVEN, CT

Chrg 1-THREATENING (53a-62) (MISD-A) FP SUPPORTED?: Y
1 CT(S)
CONDITIONAL DISCHARGE
6MO JAIL, 6MO SUSP, 1YR COND DISCH
Offense Occurrence Date: 02/01/1997 Verdict Date: 06/11/1997

8-Arrest Date: 09/17/1996 Agency: NEW HAVEN Case#: 63104
Disp Date: 12/23/1997 Rearrest Date: 12/19/1997
Dkt: N06N-MV96-0356047-S UAR:00016198,00816383,00845848,00911409
Name: REID, MARK DOB: 04/07/1964
Addr: 39 LAKE PL, NEW HAVEN, CT

Bond: \$1000 (SET) Detained at: LLU FP SUPPORTED?: Y
Chrg 1-FLR TO APPEAR 2(53a-173*) (MISD-A) 1 CT(S)
UNCONDITIONAL DISCHARGE
Offense Occurrence Date: 12/19/1996 Verdict Date: 12/23/1997

7-Arrest Date: 07/27/1995 Agency: NEW HAVEN Case#: 79641
Disp Date: 08/31/1995
Dkt: N06N-CR95-0417616-S UAR:00571447
Name: REID, MARK DOB: 04/07/1964
Addr: 723 ELM ST, NEW HAVEN, CT

Bond: \$500 (TERM) FP SUPPORTED?: Y
Chrg 1-INTRFERE/RESIST(53a-167a) (MISD-A) 1 CT(S)
CONDITIONAL DISCHARGE
6MO JAIL, 6MO SUSP, 1YR COND DISCH
Offense Occurrence Date: 07/27/1995 Verdict Date: 08/31/1995

6-Arrest Date: 10/09/1993 Agency: NEW HAVEN Case#: 106616
Disp Date: 12/21/1993
Dkt: N06N-CR93-0386272-S UAR:00282659
Name: REID, MARK DOB: 04/07/1964
Addr: 723 ELM ST, NEW HAVEN, CT

Bond: \$2000 (NON S) FP SUPPORTED?: Y
Chrg 1-CARRY DNGRS WPN(53-206(a)) (FEL -U) 1 CT(S)
CONDITIONAL DISCHARGE
1YR JAIL, 1YR SUSP, 1YR COND DISCH
Offense Occurrence Date: 10/09/1993 Verdict Date: 12/21/1993

5-Arrest Date: 08/30/1992 Agency: NEW HAVEN Case#: 88090
Disp Date: 11/04/1992
Dkt: N06N-CR92-0360046-S
Name: REID, MARK A DOB: 04/07/1964

Requested by: A.LITTMAN/NH

Date of Report: 11/16/2012 Page: 5

CT DEPT OF EMERGENCY SERVICES AND PUBLIC PROTECTION
STATE POLICE BUREAU OF IDENTIFICATION
1111 COUNTRY CLUB RD
MIDDLETOWN, CT. 06457

SPBI/SID#: CT00464733 {CONVICTED FELON}

Inmate#: 00141754

Addr: 1278 WHALLEY AVE, NEW HAVEN, CT

FV?: Y ALC?: NAR?: CDL?: CV?: HM?:

Detained at: LLU FP SUPPORTED?: Y

Chrg 1-ASSAULT 3 (53a-61) (MISD-A) 1 CT(S)

CONDITIONAL DISCHARGE

6MO JAIL, 6MO SUSP, 1YR COND DISCH

Offense Occurrence Date: 08/30/1992 Verdict Date: 11/04/1992

4-Arrest Date: 11/03/1988 Agency: NEW HAVEN

Disp Date: 12/14/1988

VOP Date: 05/04/1990

Dkt: N06N-CR88-0297316-S

Name: REID, MARK A

DOB: 04/07/1964

Addr: 723 ELM ST, NEW HAVEN, CT

Bond: \$2500 (TERM)

FP SUPPORTED?: N

Chrg 1-POSS NARCOTICS (21a-279(a)) (FEL -U) 1 CT(S)

2YR JAIL, 2YR SUSP, CONCUR, 3YR PROB

Offense Occurrence Date: 11/03/1988 Verdict Date: 12/14/1988

3-Arrest Date: 11/03/1988 Agency: NEW HAVEN

Disp Date: 12/14/1988

VOP Date: 05/04/1990

Dkt: N06N-CR88-0297317-S

Name: REID, MARK A

DOB: 04/07/1964

Addr: 723 ELM ST, NEW HAVEN, CT

Chrg 1-LARCENY 2 (53a-123) (FEL -C) 1 CT(S)

2YR JAIL, 2YR SUSP, CONCUR, 3YR PROB

Offense Occurrence Date: 11/03/1988 Verdict Date: 12/14/1988

2-Arrest Date: 12/11/1986 Agency: NEW HAVEN

Case#: 50401 (64)

Disp Date: 04/24/1987

Dkt: N06N-CR -0267425-S

Name: REID, MARK

FP SUPPORTED?: N

Chrg 1-P/NARC WITS

F 6MOS ES

1-Arrest Date: 01/02/1986 Agency: NEW HAVEN

Case#: 50401

Disp Date: 02/19/1986

Dkt: N06N-CR86-0253089-S

Name: REID, MARK

DOB: 04/07/1964

Addr: 723 ELM ST, NEW HAVEN, CT

Bond: \$1000 (PRFS)

FP SUPPORTED?: Y

Chrg 1-POSS NARCOTICS (21a-279(a)) (FEL -U) 1 CT(S)

2YR JAIL, 2YR SUSP, 4YR PROB

Offense Occurrence Date: 01/02/1986 Verdict Date: 02/19/1986

EXHIBIT C

Yale SCHOOL OF MEDICINE

Department of Psychiatry



HOWARD V. ZONANA, MD
Director, Law and Psychiatry Division
Forensic Psychiatry Residency
Training Director

Connecticut Mental Health Center
34 Park Street
New Haven CT 06519-1187
T 203 974-7158
F 203 974-7177
howard.zonana@yale.edu

June 12, 2013

To Whom It May Concern:

I, Madelon Baranoski, Ph.D., submit this letter in support of the application of Mark Anthony Reid (A 035 973 579) for release from immigration detention. In my opinion, Mr. Reid suffers from depression and Post Traumatic Stress Disorder, is in need of treatment, and is willing to engage in that treatment. I evaluated Mr. Reid over three sessions for 7.5 hours. In my opinion, although he is in need of treatment, he does not present a danger to himself or others. He has strong ties to New Haven through his daughter, her mother, his friends, and a former employer. He expressed a willingness to seek treatment at the Connecticut Mental Health Center. He recognizes the benefit of treatment, appreciates his need to remain abstinent from substances, and desires relief from his depressive symptoms. He also appreciates the requirements he will face on parole and expressed a genuine desire to lead a productive and law-abiding life, becoming a role model for his daughter. He showed insight into his vulnerabilities as well as the opportunity to redirect his life, based on his [REDACTED] and his desire to overcome the effects of the trauma of his past and his life-long fear [REDACTED]. It is also my opinion that his therapeutic needs for PTSD and depression cannot be adequately addressed while he is incarcerated.

I am an Associate Professor of Psychiatry at Yale School of Medicine, Department of Psychiatry, in the Law and Psychiatry Division and a licensed clinical psychologist at the Connecticut Mental Health Center, an agency in partnership between the State of Connecticut Department of Mental Health and Addiction Services and the Yale School of Medicine, located in New Haven, Connecticut. The Connecticut Mental Health Center serves clients with psychiatric and substance abuse disorders, and many clients are involved with the criminal justice system. I am also director the New Haven Court Diversion Program, which evaluates and refers for treatment defendants in the New Haven Superior Court and recommends programs for treatment in lieu of incarceration when appropriate.

As faculty in the Law and Psychiatry Program, I supervised Dr. Taiye Ogundipe, a fellow in the program who conducted a psychiatric evaluation of Mr. Reid and provided a written report and testimony in Mr. Reid's immigration case. I reviewed Dr. Ogundipe's report, and met with Mr. Reid's legal counsel. After the Immigration Judge denied Mr. Reid's claim, I went to see

Mr. Reid in the Franklin County Jail, where he was being held in immigration detention. I visited Mr. Reid three times, first on May 2, 2013 and again on May 9, 2013, and finally on May 16, 2013. Each visit lasted 2.5 to 3 hours. I also spoke with Mr. Reid on the phone for one hour on April 26, 2013, before my first visit.

As documented and diagnosed by Dr. Ogundipe, Mr. Reid suffers from Post-Traumatic Stress Disorder (PTSD) as a result of traumatic experiences during his childhood in Jamaica, where he was persistently tormented and attacked by neighborhood children [REDACTED]

Mr. Reid also suffers from depression and has experienced one acute panic attack while in immigration detention. He had significant suicidal plans and in my visits with him described feelings of hopelessness related not only to his incarceration but to the response of other inmates [REDACTED]. Mr. Reid agreed to seek treatment while incarcerated and has taken anti-depressant medication as prescribed. His openness to accepting treatment provides a strong foundation for his successful return to the community.

In my opinion, based on Dr. Ogundipe's and my assessment, Mr. Reid will not pose a danger to others if released from detention. Although Mr. Reid has been convicted of several minor violent offenses in the past, these days are long behind him. He is now a 49-year-old man eager for a chance to get his life back on track. Because he is willing to engage in treatment and appreciates the benefit of treatment, he does not present a current danger to himself. Although Mr. Reid suffers from depression, he is not acutely suicidal, and release from detention will likely lead to significant improvements in his mental health and wellbeing. Mr. Reid has a history of substance abuse but he has been substance free throughout his incarceration and he expressed strong conviction to remain abstinent. In addition, he will return to the community on parole supervision by the State of Connecticut and he is aware that there will be monitoring of his substance use with consequences were he to relapse. Furthermore, he is no longer attempting to [REDACTED] and he will now have access to appropriate methods of treatment as well as support services and social connections in New Haven.

Mr. Reid has longstanding connections to the New Haven community—most importantly his daughter M [REDACTED] with whom he is very close and longs to reconnect after years of physical separation. All of Mr. Reid's professional connections are located in the New Haven area—it is the only home he has ever known as an adult.

During my visits with Mr. Reid, I spoke with him about his mental health after spending several months in immigration detention, and in the wake of learning about the adverse decision by the Immigration Judge, who found that [REDACTED]. We spoke at length about his long struggle [REDACTED]

[REDACTED] and his anguish and disillusionment about the Immigration Judge's decision [REDACTED] and ordering him deported to a country he knows little about, and where he fears for his life. We also talked about his family, especially his teenage daughter M [REDACTED] his military service and his interest in veterans' issues, and his professional and literary interests. Mr. Reid demonstrated that he is ready for therapy and has the capacity to engage in psychotherapy that will be an essential component of treatment.

The conditions of Mr. Reid's detention greatly exacerbate his mental health issues. Although Mr. Reid is receiving basic medical attention within the Franklin County Jail—for example, he was recently prescribed antidepressants—he does not have recourse to the full range of treatment and coping mechanisms that would be available to him on the outside. For example, he cannot even go for a long walk, something he has found helpful in the past to ameliorate the symptoms of his PTSD, like hyper-arousal, and his anxiety. Additionally, Mr. Reid cannot receive comprehensive counseling while detained, as that would involve speaking openly and in detail about his [REDACTED] and his past struggles with [REDACTED].

If released, Mr. Reid will have access to high-quality mental health treatment and counseling free of charge at the Connecticut Mental Health Center. I will work with other staff at the Center to ensure that Mr. Reid's mental health needs are fully attended to. Mr. Reid's legal counsel have informed me that they and Mr. Reid have made all possible arrangements for his housing in New Haven in the event of his release.

Sincerely,



Madelon Baranoski, Ph.D.
Associate Professor of Psychiatry
Yale School of Medicine
Department of Psychiatry

EXHIBIT D



UNITARIAN UNIVERSALIST SOCIETY: EAST

May 20, 2013

153 West Vernon Street
Manchester, CT 06042-2209

860 646-5151
Fax: 860 649-1565
uuse153@sbcglobal.net
www.uuse.org

The Rev. Joshua Pawelek
Minister

To Whom It May Concern:

I am the Rev. Joshua Mason Pawelek, minister of the Unitarian Universalist Society: East (UUS:E) in Manchester, CT. I am writing in support of Mark Reid's application for bond while he awaits the results of his immigration appeal.

UUS:E is a 300-member Unitarian Universalist congregation with strong commitments to personal spiritual growth for adults and children, environmentalism, and social justice activism. My ministry involves preaching and leading worship on Sunday mornings, providing pastoral care to members of the congregation, supervising staff and volunteers, and engaging in a variety of social justice initiatives in the wider community.

I first came to know Mark Reid in the spring of 2012. He contacted me at the advice of two Hartford-area veterans-rights workers who believed I would be able to provide pastoral care to help him with his immigration problems. We spoke by phone on a regular basis (approximately 2-3 times per month) until he was transferred from the Brooklyn Correctional Institution in early November. I visited him once in person at the Brooklyn Correctional Institution in September. We have not spoken since his transfer.

During some of our calls Mr. Reid spoke about what he hopes to achieve upon his release. In short, he expects to become a productive member of society again. He has many years of experience as a mortgage broker and hopes he can find work in the mortgage industry. He is also pursuing his education as a paralegal to increase his options for gainful employment upon his release from prison. He has also spoken to me about joining a Unitarian Universalist congregation, in part because our congregations are [REDACTED] and in part because I have been supportive of him. He is inspired by the support he has received and speaks often of wanting to 'give back' to society in some way.



UNITARIAN
UNIVERSALIST
ASSOCIATION OF
CONGREGATIONS

I expect to continue supporting Mr. Reid as he readjusts to life outside of prison. My church and I can provide limited financial support (e.g., We are currently covering the cost for Mark's paralegal course); I can help him connect with appropriate social service providers as needed; and I can make sure he is connected to a Unitarian Universalist congregation (UUS:E or one closer to where he lives) if he wishes to be part of a spiritual community. As mentioned above, Unitarian Universalist congregations [REDACTED]

If you have any questions or would like to speak further about the content of this letter, please do not hesitate to contact me at UUS:E at (860) 646-5151 or at my home office at (860) 652-8961 or by email at revpawelek@sbcglobal.net.

Sincerely,

A handwritten signature in cursive script, appearing to read "John M. Pawelek".

The Rev. Joshua Mason Pawelek

EXHIBIT E

4-118



Inmate Performance Evaluation Form

Connecticut Department of Correction

 CN 100101
 REV 6/30/09

Inmate name: REID, MARK	Inmate number: 141754
Facility/Unit: CARL ROBINSON CORRECTIONAL INSTITUTION	Date: 4/14/11
Assignment title: VOICES	Evaluation period: 03/08/11 – 04/14/11

<u>Criteria</u>	<u>Poor</u>	<u>Fair</u>	<u>Good</u>	<u>Excellent</u>
Attendance	☐	☐	☐	☒
Initiative	☐	☐	☒	☐
Productivity	☐	☐	☒	☐
Attitude	☐	☐	☒	☐
Overall	☐	☐	☒	☐

Comments and recommendations:

Inmate Reid, Mark #141754 has successfully completed the 12 sessions of the Voices program at C.R.C.I. Voices is a program in which participants learn about the impact of crime on the victims. This awareness helps participants learn to be accountable for their actions and effects of the crime on others.

Inmate signature: <i>Mark Reid</i>	Date: 4-14-11
Supervisor name: MUDANO	Title: CCS
Supervisor signature: <i>Mudano</i>	Date: 4/14/11
Reviewer name: CASEY	Title: CC
Reviewer signature:	Date: 4/14/11

EXHIBIT F

JUN-17-2013 07:13

FROM:IES

Page:1/1

June 17, 2013

Michael Wishnie
Jerome N. Frank Legal Services Organization
Yale Law School
P.O. Box 209090
New Haven, CT 06520-9090

Re: Mark Reid Housing

Dear Attorney Wishnie:

My name is Keith Thomas and I am the Manager of Life House LLC, which operates sober housing in the greater New Haven area. I have spoken with Mr. Mark Reid and am writing to confirm that I can provide a room for Mr. Reid upon release from detention.

Our houses provide a clean and safe, sober environment for our clients.

If you have any questions or require any additional information, please feel free to contact me at 203-507-0449.

Sincerely,



Keith Thomas
Manager
Life House, LLC
1471 Dixwell Ave., Hamden, CT
763 George St., New Haven, CT

EXHIBIT G

61 STATE OF CONNECTICUT
BOARD OF PARDONS & PAROLES
INTERSTATE COMPACT OFFICE
55 WEST MAIN STREET, SUITE 520
WATERBURY, CT 06702

TELEPHONE: (203) 805-6605

FAX: (203) 805-6357

Dannel P. Malloy
Governor

ERIKA TINDILL
Chair

RELEASE TO DETAINER

REID, MARK CT# 141754 is being released on parole and turned over to IMMIGRATION AUTHORITIES for DETAINER PURPOSES.

If the said REID, MARK is released from custody at any time before 10/22/2014 (SUBJECT TO CHANGE PENDING RREC), the expiration of the maximum 5 YEAR Connecticut sentence, and on which sentence he is now being released on parole, said REID, MARK must immediately contact:

Interstate Compact Office
Connecticut Board of Parole
55 West Main St, Waterbury CT 06702
(203) 805-6683

or unless instructed to report to a Connecticut Parole Office in the district where you will reside. Failure to contact this office or report as instructed will constitute a violation of parole

I, REID, MARK do hereby declare that I have read the above paragraphs which are part of my parole agreement and I hereby accept the conditions imposed therein.

Signed, in duplicate, this 7 day of August, 2012.

x Mark Reid

Parolee's Signature

x M. Espinoza

Witness

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
IN RE: THE SECURITIES OF
AMERICAN INTERNATIONAL GROUP, INC.
Case No. 13-cv-00125

MEMORANDUM
13

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
IN RE: THE SECURITIES OF
AMERICAN INTERNATIONAL GROUP, INC.
Case No. 13-cv-00125

ELECTRONIC SIGNATURES

08/03/2012

Page 2 of 2

~~Heard on this date by the Court, the following parties were present: [illegible]~~

Name: Michelle Esposito

Signature: *Michelle Esposito*

Date of Signature: 05/23/2012

Parolee: Mark Reil Date: 8-7-2012

Witness: M Esposito Date: 8/7/12



CONNECTICUT BOARD OF PARDONS AND PAROLES

Hearing Disposition Form

INMATE:

Mark Reid

NUMBER:

141754HEARING DATE: 12/30/11HEARING LOCATION: BrooklynINMATE LOCATION: BrooklynPANEL: Chartrand, O'Connor, RichardsHEARING OFFICER: ESPOSITO

TYPE OF RELEASE: ☒ DISCRETIONARY ☐ SPECIAL PAROLE ☐ TRANSFER PAROLE
☐ ESP ☐ MEDICAL PAROLE ☐ COMPASSIONATE PAROLE

TYPE OF HEARING: ☐ FULL PANEL REVIEW ☐ COURTESY HEARING ☐ OTHER:

CASE REVIEW WITH: ☐ ADD CONDITIONS ☐ MODIFY CONDITIONS ☐ REMOVE CONDITIONS

ON THE ABOVE DATE, A PANEL OF THE BOARD TOOK THE FOLLOWING ACTION:

☐ Unanimity Decision with Panel Member ☐ Dissenting.
☒ PAROLE EFFECTIVE (ON OR AFTER: 10/21/2012) ☐ SPECIAL PAROLE CONDITIONS ESTABLISHED
☐ PAROLE DENIED; NEW PAROLE HEARING DATE:
☐ PAROLE DENIED; NO NEW PAROLE HEARING ☐ PROBATION TO FOLLOW
☐ PAROLE DENIED; SPECIAL PAROLE CONDITIONS ESTABLISHED. SPECIAL PAROLE START DATE:
☐ ESP ELIGIBLE: Eligibility Date: Hearing Date:
☐ CONTINUED:
 RESIDENCE: (CITY/TOWN): ICE Detainer (DISTRICT / UNIT):

ADDITIONAL CONDITIONS REQUIRED:

☒ Parole to the state of: ☐ Parole to Detainer (specify):
☐ Contingent upon: ☐ Continued Participation in a Program for (specify):
☐ Payment of \$ fine.
☐ Mental Health Evaluation and Treatment as Deemed Necessary
☐ Mental Health Treatment with / for: ☐ w/ DMHAS Support ☐ Medication Monitoring ☐ Other:
☒ Electronic Monitoring ☐ Use of a Motor Vehicle: ☐ Strictly Prohibited ☐ Only with P.O. permission
☒ No Contact with (name): ☐ Victim(s) ☐ w/o Permission ☐ Other: ☐ w/o Permission
☒ Co-Defendant(s) ☐ w/o Permission ☐ Other: ☐ w/o Permission
☐ No consumption of Alcoholic Beverages
☐ Residential Placement
 Return at the first sign of: ☐ Criminal Activity ☐ Illegal Drug Use ☐ Alcohol Use
☐ Contact with Victim / Co-Defendant / Other:
 Behavioral Management Program: ☐ Problem Sexual Behavior ☐ Anger Management ☐ Domestic Violence ☐ Gambling
☐ Family Counseling ☐ Other:
☐ Other:
☐ Other:
☐ Other:

REASONS FOR DENIAL (IF APPLICABLE):

Due to the following, the panel has concluded that you do not meet the statutory criteria for parole (indicated by a check mark):

☐ Nature and/or Circumstances of the Current Offense ☐ Injury and/or Impact on the Victim(s) or Victim's Family
☐ Inadequate Institutional Program Participation ☐ Criminal History
☐ Poor Institutional Adjustment ☐ Deemed Inappropriate for outpatient Sex Offender Treatment
☐ History of Poor Performance while on: ☐ Probation ☐ Parole ☐ Community Release
☐ Current Offense Committed while on: ☐ Probation ☐ Parole ☐ Community Release
☐ Other:
☐ Other:

Reasons for a Continuance:

Panel Recommendations: ☐ Avoid future disciplinary reports ☐ Involvement / continue with positive programming

Other:

EXHIBIT H

U.S. Department of Homeland Security

Notice to Appear

In removal proceedings under section 240 of the Immigration and Nationality Act:

Subject ID : 341233140

FIN #: 1142625436

File No: A035 973 579

DOB: [REDACTED] 1964

Event No: HAR1210000091

In the Matter of:

Mark Anthony REID

Respondent:

currently residing at:

C/O FRANKLIN COUNTY HOUSE OF CORRECTIONS 160 ELM ST , GREENFIELD MASSACHUSETTS 01301

(Number, street, city and ZIP code)

(Area code and phone number)

- ☐ 1. You are an arriving alien.
- ☐ 2. You are an alien present in the United States who has not been admitted or paroled.
- ☒ 3. You have been admitted to the United States, but are removable for the reasons stated below.

The Department of Homeland Security alleges that you:

See Continuation Page Made a Part Hereof

On the basis of the foregoing, it is charged that you are subject to removal from the United States pursuant to the following provision(s) of law:

See Continuation Page Made a Part Hereof

- ☐ This notice is being issued after an asylum officer has found that the respondent has demonstrated a credible fear of persecution or torture.
- ☐ Section 235(b)(1) order was vacated pursuant to: ☐ 8CFR 208.30(f)(2) ☐ 8CFR 235.3(b)(5)(iv)

YOU ARE ORDERED to appear before an immigration judge of the United States Department of Justice at:

A. A. Ribicoff Federal Building 450 Main St Rm 628 Hartford CONNECTICUT US 06103

on a date to be set at a time to be set to show why you should not be removed from the United States based on the

(Date) (Time)

charge(s) set forth above.

MICHAEL S. LOSER

SUPV. DETENTION & DEPORTATION OFF(

(Signature and Title of Issuing Officer)

Date: November 13, 2012

Hartford, CT

(City and State)

See reverse for important information

Form I-862 (Rev. 08/01/07)

U.S. Department of Homeland Security

Continuation Page for Form I862

Alien's Name Mark Anthony REID	File Number A035 973 579 Event No: HAR1210000091	Date <i>November 13, 2012</i> ~~October 18, 2011~~
--	--	--

THE SERVICE ALLEGES THAT YOU:

- =====
1. You are not a citizen or national of the United States;
 2. You are a native of JAMAICA and a citizen of JAMAICA;
 3. You were admitted to the United States at Miami, FL on or about September 7, 1978 as a Lawful Permanent Resident (P5-3);
 4. You were, on June 6, 2002, convicted in the State of Connecticut Superior Court in Milford, CT for the offense of Possession of Heroin, in violation of C.G.S./P.A. No: 21a-279(a).
 5. You were, on July 7, 2010, convicted in the State of Connecticut Superior Court in New Haven, CT for the offense of Sale of a Narcotic Substance, in violation of C.G.S./P.A. No: 21a-278(b).
 6. You were, on August 25, 2004, convicted in the State of Connecticut Superior Court in New Haven for the offense of Sale of Halucinogen/Narcotic in violation of C.G.S./P.A. No: 21a-277(a).
 7. You were, on August 25, 2004, convicted in the State of Connecticut Superior Court in New Haven for the offense of Sale of Halucinogen/Narcotic in violation of C.G.S./P.A. No: 21a-277(a).

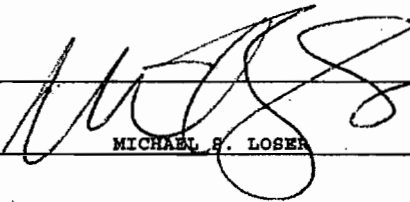
ON THE BASIS OF THE FOREGOING, IT IS CHARGED THAT YOU ARE SUBJECT TO REMOVAL FROM THE UNITED STATES PURSUANT TO THE FOLLOWING PROVISION(S) OF LAW:

=====

Section 237(a)(2)(A)(iii) of the Immigration and Nationality Act (Act), as amended, in that, at any time after admission, you have been convicted of an aggravated felony as defined in Section 101(a)(43)(B) of the Act, an offense relating to the illicit trafficking in a controlled substance, as described in section 102 of the Controlled Substances Act, including a drug trafficking crime, as defined in section 924(c) of Title 18, United States Code.

Section 237(a)(2)(B)(i) of the Immigration and Nationality Act, as amended, in that, at any time after admission, you have been convicted of a violation of (or a conspiracy or attempt to violate) any law or regulation of a State, the United States, or a foreign country relating to a controlled substance (as defined in Section 102 of the Controlled Substances Act, 21 U.S.C. 802), other than a single offense involving possession for one's own use of 30 grams or less of marijuana.

Signature



MICHAEL S. LOSER

Title

SUPV. DETENTION & DEPORTATION OFFIC

3 of 3 Pages

Notice to Respondent

Warning: Any statement you make may be used against you in removal proceedings.

Alien Registration: This copy of the Notice to Appear served upon you is evidence of your alien registration while you are under removal proceedings. You are required to carry it with you at all times.

Representation: If you so choose, you may be represented in this proceeding, at no expense to the Government, by an attorney or other individual authorized and qualified to represent persons before the Executive Office for Immigration Review, pursuant to 8 CFR 3.16. Unless you so request, no hearing will be scheduled earlier than ten days from the date of this notice, to allow you sufficient time to secure counsel. A list of qualified attorneys and organizations who may be available to represent you at no cost will be provided with this notice.

Conduct of the hearing: At the time of your hearing, you should bring with you any affidavits or other documents, which you desire to have considered in connection with your case. If you wish to have the testimony of any witnesses considered, you should arrange to have such witnesses present at the hearing.

At your hearing you will be given the opportunity to admit or deny any or all of the allegations in the Notice to Appear and that you are inadmissible or removable on the charges contained in the Notice to Appear. You will have an opportunity to present evidence on your own behalf, to examine any evidence presented by the Government, to object, on proper legal grounds, to the receipt of evidence and to cross examine any witnesses presented by the Government. At the conclusion of your hearing, you have a right to appeal an adverse decision by the immigration judge.

You will be advised by the immigration judge before whom you appear of any relief from removal for which you may appear eligible including the privilege of departure voluntarily. You will be given a reasonable opportunity to make any such application to the immigration judge.

Failure to appear: You are required to provide the DHS, in writing, with your full mailing address and telephone number. You must notify the Immigration Court immediately by using Form EOIR-33 whenever you change your address or telephone number during the course of this proceeding. You will be provided with a copy of this form. Notices of hearing will be mailed to this address. If you do not submit Form EOIR-33 and do not otherwise provide an address at which you may be reached during proceedings, then the Government shall not be required to provide you with written notice of your hearing. If you fail to attend the hearing at the time and place designated on this notice, or any date and time later directed by the Immigration Court, a removal order may be made by the immigration judge in your absence, and you may be arrested and detained by the DHS.

Mandatory Duty to Surrender for Removal: If you become subject to a final order of removal, you must surrender for removal to one of the offices listed in 8 CFR 241.16(a). Specific addresses on locations for surrender can be obtained from your local DHS office or over the internet at <http://www.ice.gov/about/dro/contact.htm>. You must surrender within 30 days from the date the order becomes administratively final, unless you obtain an order from a Federal court, immigration court, or the Board of Immigration Appeals staying execution of the removal order. Immigration regulations at 8 CFR 241.1 define when the removal order becomes administratively final. If you are granted voluntary departure and fail to depart the United States as required, fail to post a bond in connection with voluntary departure, or fail to comply with any other condition or term in connection with voluntary departure, you must surrender for removal on the next business day thereafter. If you do not surrender for removal as required, you will be ineligible for all forms of discretionary relief for as long as you remain in the United States and for ten years after departure or removal. This means you will be ineligible for asylum, cancellation of removal, voluntary departure, adjustment of status, change of nonimmigrant status, registry, and related waivers for this period. If you do not surrender for removal as required, you may also be criminally prosecuted under section 243 of the Act.

Request for Prompt Hearing

To expedite a determination in my case, I request an immediate hearing. I waive my right to a 10-day period prior to appearing before an immigration judge.

Before:

(Signature of Respondent)

Date: _____

(Signature and Title of Immigration Officer)

Certificate of Service

This Notice To Appear was served on the respondent by me on 11/13/2012, in the following manner and in compliance with section 239(a)(1)(F) of the Act.

- ☒ in person ☐ by certified mail, returned receipt requested ☐ by regular mail
☐ Attached is a credible fear worksheet.
☒ Attached is a list of organization and attorneys which provide free legal services.

The alien was provided oral notice in the English language of the time and place of his or her hearing and of the consequences of failure to appear as provided in section 240(b)(7) of the Act.

Mark [Signature]
(Signature of Respondent if Personally Served)

[Signature] Deputy Chief
(Signature and Title of officer)

EXHIBIT I

Attorney or Representative

Name: Michael J. Wishnie

Address:

Jerome N. Frank Legal Services
Organization
124 Wall Street
New Haven, CT 06511

United States Department of Justice
Executive Office for Immigration Review Immigration Court
Hartford, Connecticut

In the Matter of:

Mark Anthony Reid

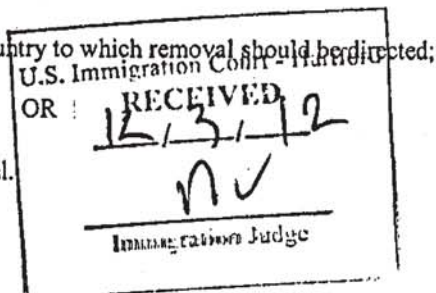
In removal proceedings

File No.: A# 035-973-579

RESPONDENT'S WRITTEN PLEADING

On behalf of my client, I make the following representations:

1. The respondent concedes proper service of the Notice to Appear, dated Nov. 13, 2012.
2. I have explained to the respondent (through an interpreter, if necessary):
 - a. the rights set forth in 8 C.F.R. § 1240.10(a);
 - b. the consequences of failing to appear in court as set forth in INA § 240(b)(5);
 - c. the limitation on discretionary relief for failure to appear set forth in INA § 240(b)(7);
 - d. the consequences of knowingly filing or making a frivolous application as set forth in INA § 208(d)(6);
 - e. the requirement to notify the court within five days of any change of address or telephone number, using Form EOIR-33/IC pursuant to 8 C.F.R. § 1003.15(d).
3. The respondent concedes the following allegation(s) all, and denies the following allegation(s) _____.
4. The respondent concedes the following charge(s) of removability all, and denies the following charge(s) of removability _____.
5. In the event of removal, the respondent;
 - ☐ names _____ as the country to which removal should be directed;
 - ☒ declines to designate a country of removal.



000007

6. The respondent will be applying for the following forms of relief from removal:

- ☒ Termination of Proceedings
- ☐ Asylum
- ☒ Withholding of Removal (Restriction on Removal) (Convention Against Torture)
- ☐ Adjustment of Status
- ☐ Cancellation of Removal pursuant to INA §
- ☐ Waiver of Inadmissibility pursuant to INA §
- ☐ Voluntary Departure
- ☒ Other (specify) possible deriv. citizenry
- ☐ None

7. If the relief from removal requires an application, the respondent will file the application (other than asylum), no later than fifteen (15) days before the date of the individual calendar hearing, unless otherwise directed by the court. The respondent acknowledges that, if the application(s) are not timely filed, the application(s) will be deemed waived and abandoned under 8 C.F.R. § 1003.31(c).

If the respondent is filing a defensive asylum application, the asylum application will be filed in open court at the next master calendar hearing.

8. If background and security investigations are required, the respondent has received the DHS biometrics instructions and will timely comply with the instructions. I have explained the instructions to the respondent (through an interpreter, if necessary). In addition, I have explained to the respondent (through an interpreter, if necessary), that, under 8 C.F.R. § 1003.47(d), failure to provide biometrics or other biographical information within the time allowed will constitute abandonment of the application unless the respondent demonstrates that such failure was the result of good cause.

9. The respondent estimates that 4 hours will be required for the respondent to present the case.

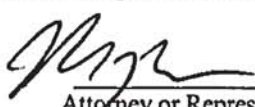
10. ☐ It is requested that the Immigration Court order an interpreter proficient in the _____ language, _____ dialect;

OR

☒ The respondent speaks English and does not require the services of an interpreter.

Date

12/3/12


Attorney or Representative for the Respondent

RESPONDENT'S PLEADING DECLARATION

I, Mark Reid, have been advised of my rights in these proceedings by my attorney or representative. I understand those rights. I waive a further explanation of those rights by this court.

I have been advised by my attorney or representative of the consequences of failing to appear for a hearing. I have also been advised by my attorney of the consequences of failing to appear for a scheduled date of departure or deportation. I understand those consequences.

I have been advised by my attorney or representative of the consequences of knowingly filing a frivolous asylum application. I understand those consequences.

I have been advised by my attorney or representative of the consequences of failing to follow the DHS biometrics instructions within the time allowed. I understand those consequences.

I understand that if my mailing address changes I must notify the court within 5 days of such change by completing an Alien's Change of Address Form (Form EOIR-33/IC) and filing it with this court.

Finally, my attorney or representative has explained to me what this Written Pleading says. I understand it, I agree with it, and I request that the court accept it as my pleading.

12/1/12
Date

Mark Reid
Respondent

EXHIBIT J

In Person

NOTICE OF HEARING IN REMOVAL PROCEEDINGS
 IMMIGRATION COURT
 450 MAIN ST., ROOM 628
 HARTFORD, CT 06103

Call up date
 January 28, 2013

RE: REID, MARK ANTHONY
 FILE: A035-973-579

DATE: Dec 5, 2012

TO: JEROME FRANK LEGAL ORGANIZATION - YALE LAW SCHOOL
 WISHNIE, MICHAEL
 P.O. BOX 209090
 NEW HAVEN, CT 06520

Please take notice that the above captioned case has been scheduled for a
 INDIVIDUAL hearing before the Immigration Court on Feb 13, 2013 at 08:30 A.M. at:

450 MAIN ST., ROOM 628
 HARTFORD, CT 06103

You may be represented in these proceedings, at no expense to the Government, by an attorney or other individual who is authorized and qualified to represent persons before an Immigration Court. Your hearing date has not been scheduled earlier than 10 days from the date of service of the Notice to Appear in order to permit you the opportunity to obtain an attorney or representative. If you wish to be represented, your attorney or representative must appear with you at the hearing prepared to proceed. You can request an earlier hearing in writing.

Failure to appear at your hearing except for exceptional circumstances may result in one or more of the following actions: (1) You may be taken into custody by the Department of Homeland Security and held for further action. OR (2) Your hearing may be held in your absence under section 240(b)(5) of the Immigration and Nationality Act. An order of removal will be entered against you if the Department of Homeland Security established by clear, unequivocal and convincing evidence that a) you or your attorney has been provided this notice and b) you are removable.

IF YOUR ADDRESS IS NOT LISTED ON THE NOTICE TO APPEAR, OR IF IT IS NOT CORRECT, WITHIN FIVE DAYS OF THIS NOTICE YOU MUST PROVIDE TO THE IMMIGRATION COURT HARTFORD, CT THE ATTACHED FORM EOIR-33 WITH YOUR ADDRESS AND/OR TELEPHONE NUMBER AT WHICH YOU CAN BE CONTACTED REGARDING THESE PROCEEDINGS. EVERYTIME YOU CHANGE YOUR ADDRESS AND/OR TELEPHONE NUMBER, YOU MUST INFORM THE COURT OF YOUR NEW ADDRESS AND/OR TELEPHONE NUMBER WITHIN 5 DAYS OF THE CHANGE ON THE ATTACHED FORM EOIR-33. ADDITIONAL FORMS EOIR-33 CAN BE OBTAINED FROM THE COURT WHERE YOU ARE SCHEDULED TO APPEAR. IN THE EVENT YOU ARE UNABLE TO OBTAIN A FORM EOIR-33, YOU MAY PROVIDE THE COURT IN WRITING WITH YOUR NEW ADDRESS AND/OR TELEPHONE NUMBER BUT YOU MUST CLEARLY MARK THE ENVELOPE "CHANGE OF ADDRESS." CORRESPONDENCE FROM THE COURT, INCLUDING HEARING NOTICES, WILL BE SENT TO THE MOST RECENT ADDRESS YOU HAVE PROVIDED, AND WILL BE CONSIDERED SUFFICIENT NOTICE TO YOU AND THESE PROCEEDINGS CAN GO FORWARD IN YOUR ABSENCE.

A list of free legal service providers has been given to you. For information regarding the status of your case, call toll free 1-800-898-7180 or 240-314-1500. For information on Immigration Court procedures, please consult the Immigration Court Practice Manual, available at www.usdoj.gov/eoir.

CERTIFICATE OF SERVICE

THIS DOCUMENT WAS SERVED BY: MAIL (M) PERSONAL SERVICE (P)
 TO: ☐ ALIEN ☐ ALIEN c/o Custodial Officer [m] ALIEN's ATT/REP [p] DHS
 DATE: 12/5/12 BY: COURT STAFF SD
 Attachments: ☐ EOIR-33 ☐ EOIR-28 ☐ Legal Services List ☐ Other

V3

EXHIBIT K

DHS Request for Continuance

The Respondent filed a Motion for Bond Hearing on June 11, 2013 and EOIR noticed DHS on June 12, 2013 that a hearing would be held the very next day. Unfortunately, the attorney responsible for this matter will not be assigned duty on 13 June, 2013 and is not available for the Bond Hearing. Mr. Marley also has an official DHS commitment outside the office on June 14, 2013.

An additional factor to consider in determining whether to grant or deny this DHS request for continuance is the fact that the respondent recently filed a FOIA request for information contained in the DHS file. This resulted in the respondent's DHS file being transferred to the National Records Center (NRC) to comply with the FOIA request. Presently, DHS does not have the "A" file or any supporting documents necessary to litigate a bond hearing because the file is at the NRC pursuant to the respondent's request.

DHS recommends that because the Respondent is currently detained with an appeal pending before the Board of Immigration Appeals, that there is no urgency in litigating this case without the DHS file. DHS has ordered the file from the NRC and anticipates having the file in approximately 10-business days.

Respectfully,

John Marley
Senior Attorney

CERTIFICATE OF SERVICE

This is to certify that on June 12, 2013, I caused a true and correct copy of this document to be served on Yale Law School, Jerome N. Frank Legal Services, counsel for the Respondent, via mail P.O. Box 2019090, New Haven, CT 06520-9090.

John Marley
Senior Attorney

EXHIBIT L



Executive Office for Immigration Review

*Board of Immigration Appeals
Office of the Clerk*

5107 Leesburg Pike, Suite 2000
Falls Church, Virginia 22041

Ahmad, Muneer I., Esq.
Jerome N. Frank Legal Serv. Organization
P.O. Box 209090
New Haven, CT 06520-9090

DHS/ICE Office of Chief Counsel - HAR
P. O. Box 230217
Hartford, CT 06123-0217

Name: REID, MARK ANTHONY

A035-973-579

Type of Proceeding: Removal

Date of this notice: 5/6/2013

Type of Appeal: Case Appeal

Filed By: Alien

FILING RECEIPT FOR APPEAL

The Board of Immigration Appeals acknowledges receipt of your appeal and fee or fee waiver request (where applicable) on 5/3/2013 in the above-referenced case.

WARNING: If you leave the United States after filing this appeal but before the Board issues a decision your appeal will be considered withdrawn and the Immigration Judge's decision will become final as if no appeal had been taken (unless you are an "arriving alien" as defined in the regulations under 8 C.F.R. § 1001.1(q)).

WARNING: If you have been granted voluntary departure by the Immigration Judge, you must submit sufficient proof of having posted the voluntary departure bond set by the Immigration Judge to the Board of Immigration Appeals. Your submission of proof must be provided to the Board within 30 days of filing this appeal. If you do not timely submit proof to the Board that the voluntary departure bond has been posted, the Board cannot reinstate the period of voluntary departure. 8 C.F.R. § 1240.2(c)(3)(ii).

PLEASE NOTE:

In all future correspondence or filings with the Board, please list the name and alien registration number ("A" number) of the case (as indicated above), as well as all of the names and "A" numbers for every family member who is included in this appeal.

If you have any questions about how to file something at the Board, you should review the Board's Practice Manual at www.justice.gov/eoir.

Proof of service on the opposing party at the address above is required for ALL submissions to the Board of Immigration Appeals -- including correspondence, forms, briefs, motions, and other documents. If you are the Respondent or Applicant, the "Opposing Party" is the District Counsel for the DHS at the address shown above. Your certificate of service must clearly identify the document sent to the opposing party, the opposing party's name and address, and the date it was sent to them. Any submission filed with the Board without a certificate of service on the opposing party will be rejected.

ThomasRu

Userteam: PCM

EXHIBIT M

U.S. Department of Homeland Security

Notice of Custody Determination

Mark Anthony REID

Event No: HAR1210000091

File No: A035 973 579

Date: ~~10/18/2011~~

13 NOVEMBER 2012 R

C/O: CARL ROBINSON C.I.
285 SHAKER ROAD
ENFIELD, CONNECTICUT 06082

Pursuant to the authority contained in section 236 of the Immigration and Nationality Act and part 236 of title 8, Code of Federal Regulations, I have determined that pending a final determination by the immigration judge in your case, and in the event you are ordered removed from the United States, until you are taken into custody for removal, you shall be:

- ☒ detained in the custody of the Department of Homeland Security.
☐ released under bond in the amount of \$ _____
☐ released on your own recognizance.

- ☒ You may request a review of this determination by an immigration judge.
☐ You may not request a review of this determination by an immigration judge because the Immigration and Nationality Act prohibits your release from custody.

DAVID OSTROBINSKI

(Signature of authorized officer)

SUPERVISORY DEPORTATION OFFICER

(Title of authorized officer)

Hartford, CT

(Office location)

- ☒ I do ☐ do not request a redetermination of this custody decision by an immigration judge.
☒ I acknowledge receipt of this notification.

Mark Reid
 (Signature of respondent)

11/13/12
 (Date)

RESULT OF CUSTODY REDETERMINATION

On _____, custody status/conditions for release were reconsidered by:

- ☐ Immigration Judge ☐ DHS Official ☐ Board of Immigration Appeals

The results of the redetermination/reconsideration are:

- ☐ No change - Original determination upheld. ☐ Release - Order of Recognizance
☐ Detain in custody of this Service. ☐ Release - Personal Recognizance
☐ Bond amount reset to _____ ☐ Other: _____

 (Signature of officer)

EXHIBIT N

The Jerome N. Frank Legal Services Organization

YALE LAW SCHOOL

June 4, 2013

VIA CERTIFIED MAIL

Officer Hurley
Department of Homeland Security
ICE Enforcement and Removal Operations
Boston Field Office
10 New England Executive Park
Burlington, MA 01803

Re: Request to Refrain from Transferring Mr. Mark Anthony Reid (A# 035 973 579)

Dear Officer Hurley:

We are writing to request that the Department of Homeland Security Immigration and Customs Enforcement refrain from transferring our client, Mark Anthony Reid (A# 035 973 579), from the Franklin County Jail and House of Correction in Greenfield, Massachusetts. We make this request in order to facilitate our ability to provide effective legal representation to Mr. Reid in his ongoing immigration proceedings.

Mr. Reid is currently appealing an adverse decision by the immigration judge to the Board of Immigration Appeals. The process of preparing the appeal requires regular and frequent contact between Mr. Reid and his legal representatives. Moreover, given the fact-intensive nature of Mr. Reid's case, the process of preparing his appeal is likely to require a substantial amount of time and an intense period of attorney-client communication. Furthermore, because briefing of the appeal to the BIA will not be complete until late July at the earliest, and because Mr. Reid intends to appeal any adverse decision by the BIA to the U.S. Court of Appeals for the Second Circuit, it is likely that Mr. Reid will remain detained for some time, and that we will have an ongoing need to communicate with him about his case.

We will be able to more effectively represent Mr. Reid at Franklin County because it is the closest immigration detention facility to New Haven. Additionally, we have encountered obstacles placing confidential, legal phone calls to Mr. Reid at Plymouth County Correctional Facility, as well as to clients detained in other Massachusetts facilities housing immigration detainees. For these reasons, we will be best able to provide Mr. Reid legal assistance if ICE maintains custody of him at Franklin County.

Thank you for your consideration. Please do not hesitate to contact me if you require further information.

Sincerely,

Muneer I. Ahmad (LSE)

Muneer I. Ahmad
Supervising Attorney
Counsel for Mark Anthony Reid

EXHIBIT O

DETAINED

Linda Evarts, Law Graduate Intern
Tassity Johnson, Law Graduate Intern
Travis Silva, Law Graduate Intern
Matthew S. Vogel, Law Graduate Intern
Muneer I. Ahmad, Supervising Attorney
Michael J. Wishnie, Supervising Attorney
Jerome N. Frank Legal Services Organization
Yale Law School
P.O. Box 209090
New Haven, CT 06520-9090

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
HARTFORD, CONNECTICUT**

In the Matter of:)
)
)

MARK REID,)
)
)

File No.: A 035 973 579

In removal proceedings)
)
)

June 10, 2013

MOTION FOR BOND REDETERMINATION

Respondent Mark Reid, through his attorneys, moves this Court to promptly schedule a bond redetermination hearing pursuant to INA § 236(a) and (c), and 8 C.F.R. § 1003.19, and to set a reasonable bond.

In support of this motion, Mr. Reid states through counsel as follows:

1. Immigration and Customs Enforcement ("ICE") took custody of Mr. Reid on November 13, 2012 and has held him continuously since then, for approximately seven months.

2. Mr. Reid is currently being held at the Franklin County Jail and House of Corrections in Greenfield, Massachusetts. This Immigration Court has jurisdiction for bond purposes over immigration detainees at Franklin County.

3. Mr. Reid was taken into ICE custody after serving three years of a twelve year suspended sentence for the sale of illegal drugs, failure to appear in the first degree, and conspiracy to commit burglary in the third degree. Conn. Gen. Stat. Ann. § 21a-278(b); id. § 53a-103; id. § 53a-172.

4. On November 13, 2012, ICE refused to determine bond for Mr. Reid on the ground that he has been convicted of an aggravated felony. See Exhibit A. Pursuant to ICE's interpretation of INA § 236(c), no individual convicted of an aggravated felony is eligible for bond, even when the individual's immigration detention exceeds six months.

5. ICE's interpretation of INA § 236(c) is contrary to the most recent construction of the statute by a federal court. In April 2013, the U.S. Court of Appeals for the Ninth Circuit held that the authority of the Department of Homeland Security ("DHS") to detain individuals shifts from INA § 236(c) to INA § 236(a) once their detention exceeds six months. Rodriguez v. Robbins, -- F.3d --, 2013 WL 1607706, slip op. at *7 (9th Cir. Apr. 16, 2013).

6. Under INA § 236(a), individuals cannot be detained for longer than six months without being provided a bond hearing to contest the necessity of prolonged detention. Rodriguez, 2013 WL 1607706 at *4-5; Diouf v. Napolitano, 634 F.3d 1081, 1091-92 (9th Cir.2011) (recognizing that detention under INA § 236(a) becomes prolonged at 180 days, or six months); Casas-Castrillon v. Department of Homeland Security, 535 F.3d 942, 951 (9th Cir.2008) (finding that "prolonged" detention under INA § 236(a) is permissible only when the

detained individual has been afforded “an adequate opportunity to contest the necessity of his detention.”).

7. Mr. Reid has now been detained for nearly seven months; thus, DHS holds him pursuant to INA § 236(a), not INA § 236(c). As INA § 236(a) does not authorize detentions exceeding six months without a bond hearing, Mr. Reid must be given a bond redetermination.

8. Numerous courts have rejected ICE’s interpretation of INA § 236(c), holding instead that the statutory provision must be construed to contain a limitation on the amount of time an individual can be detained without an individualized bond hearing. Flores-Powell v. Chadbourne, 677 F. Supp. 2d. 455, 471 (D. Mass. 2010). Thus, individuals detained under INA § 236(c) are entitled to a bond hearing when “no reasonable likelihood exists that the issue of . . . [their] removal will be finally resolved in the foreseeable future” and they have been “held for an unreasonable period of time pending removal proceedings.” Bourguignon v. MacDonald, 667 F. Supp. 2d 175, 184 (D. Mass 2009); see also Diop v. ICE/Homeland Sec., 656 F.3d 221 (3d Cir. 2011); Tijani v. Willis, 430 F.3d 1241 (9th Cir. 2005); Ly v. Hansen, 351 F.3d 263 (6th Cir. 2004).

9. In at least one previous case in the Hartford Immigration Court, Immigration Judge Straus held that he lacked jurisdiction to conduct a bond hearing for a respondent convicted of an aggravated felony but detained more than six months, based on his interpretation of INA § 236(c). Judge Straus’s interpretation of INA § 236(c) was overturned by a federal district court in a habeas proceeding brought by the same respondent. Judge Michael Ponsor of U.S. District Court for the District of Massachusetts, Springfield Division, rejected Judge Straus’s interpretation of § 236(c) and ordered DHS to conduct a bond hearing once the respondent’s removal was not “foreseeable.” Bourguignon, 667 F. Supp. 2d. at 183.

10. Courts have also found that a resolution of removal “in the foreseeable future” is unlikely when a detainee “vigorously contests the issue of his deportability,” raising the possibility of a lengthy appeals process. *Id.* at 183; accord *Tijani v. Willis*, 430 F.3d 1241, 1242 (9th Cir. 2005) (finding that removal was not “expeditious” because of anticipated lengthy appellate proceedings).

11. Mr. Reid has contested his order of removal in this Court on the grounds that he is entitled to deferral of removal under the Convention Against Torture and that removal would be disproportionate, in violation of INA § 240(c)(1)(A). On April 5, 2013, he timely appealed an adverse decision from this Court on those claims to the Board of Immigration Appeals. Briefing by the parties is due to the Board by June 20, 2013, although Mr. Reid has filed a request for an extension. The BIA will either remand for further proceedings or affirm this Court’s decision. If the latter, Mr. Reid plans to appeal any adverse BIA decision to the U.S. Court of Appeals for the Second Circuit, a process that is predictably lengthy. In either event, a final resolution of his removal proceeding is not likely for months or years, and is therefore not reasonably foreseeable.

12. Detention exceeding a “limited period” is unreasonable, in violation of the Fifth Amendment’s Due Process Clause, and thus unauthorized by INA § 236(c). See *Demore v. Kim*, 538 U.S. 510, 530 (2003); *id.* at 554 (Kennedy, J., concurring).

13. Courts throughout the nation have ordered bond hearings for individuals detained under § 236(c) once their detention exceeds the “limited” time frame in *Demore* and thus becomes unreasonable. See, e.g., *Bourguignon*, 667 F. Supp. 2d. at 183; *Flores-Powell v. Chadbourne*, 677 F. Supp. 2d. 455 (D. Mass. 2010) (finding lengthy immigration detention “unreasonable” and ordering bonding hearing for Respondent); *Parlak v. Baker*, 374 F.Supp.2d 551 (E.D. Mich. 2005) (finding detention lasting for eight months unreasonable); *Hippolyte v.*

Enzer, 2007 U.S. Dist. LEXIS 44205 (D. Conn. June 19, 2007) (finding detention lasting for fifteen months unreasonable); see also Leslie v. Att’y Gen’l, 678 F.3d 265 (3d Cir. 2012) (holding that individuals held under § 236(c) must be afforded bond hearing once detention becomes unreasonable); Alli v. Decker, 644 F. Supp. 535, 541 (M.D. Pa. 2009) rev’d on other grounds, 650 F.3d 1007 (3d Cir. 2011) (“If an alien detained pursuant to [8 U.S.C.] § 1226(c) makes a showing via a habeas petition that detention is no longer reasonable, the alien must be afforded a hearing before the habeas court at which the government bears the burden of justifying continued detention based on traditional bail factors . . .”).

14. In addition, the Excessive Bail Clause of the Eighth Amendment prohibits the Government from setting conditions of release or detention that are “‘excessive’ in light of the perceived evil.” United States v. Salerno, 481 U.S. 739 (1987); U.S. Const. amend VIII. To avoid constitutional doubt, INA § 236(c) must be construed to require a bond hearing when no compelling government interest in the detention, other than the prevention of flight, exists and the length of detention is not limited.

15. Mr. Reid has been detained by ICE for nearly seven months, a period that exceeds the maximum length of time INA § 236 can authorize detention under Rodriguez. In addition, Mr. Reid’s pending appeal with the BIA and the likelihood of either a remand from the BIA or a petition for review to the Second Circuit, should the BIA affirm this Court’s decision, establish that his removal is not foreseeable. If Mr. Reid is denied bond, his total detention time will far surpass the limited period that courts applying Demore have considered reasonable.

14. Following Matter of Patel, ICE should not detain Mr. Reid unless there is a risk that he will abscond or he poses a danger to persons or property. 15 I. & N. Dec. 666 (BIA 1976).

15. Mr. Reid is not a flight risk. As testimony and evidence in his removal proceeding demonstrated, he has lived in the United States for 35 years and has spent his entire adult life in Connecticut. His entire family, including his mother, sister, and two children, are in the United States.

16. Mr. Reid also does not pose a danger to persons or property. As the record in his removal proceeding establishes, Mr. Reid suffered for many years from drug addiction, and most of his criminal convictions are a result of his past addiction. He has been sober now for the years of his incarceration and he is dedicated to remaining drug-free. Since his most recent conviction, for which he served two years, he has begun to seek spiritual and psychological counseling for the extensive trauma he suffered as a child, and has committed to making better decisions in the future. See Exhibit B.

17. If this Court denies Mr. Reid's motion for bond redetermination without an opportunity for a hearing, he will be detained in violation of the INA because INA § 236 does not authorize detention exceeding six months, or an otherwise limited period of time, without a bond hearing. He will also suffer a deprivation of liberty in violation of the Due Process Clause of the Fifth Amendment and cruel and unusual punishment in violation of the Eighth Amendment because he will be unreasonably detained without a compelling government interest for denying him bond.

WHEREFORE, Mr. Reid moves this Court to schedule a bond redetermination hearing for the earliest date possible.

Respectfully submitted,



Linda Everts, Law Graduate Intern
Tassity Johnson, Law Graduate Intern
Travis Silva, Law Graduate Intern
Matthew S. Vogel, Law Graduate Intern
Muneer I. Ahmad, Supervising Attorney
Michael Wishnie, Supervising Attorney
Jerome Frank Legal Services Organization
Yale Law School
P.O. Box 209090
New Haven, CT 06520
(203) 432-4800

Counsel for Respondent

LIST OF DOCUMENTS IN SUPPORT OF MOTION FOR BOND
REDETERMINATION FOR MARK REID

1. **Exhibit A: ICE I-286, Notice of Custody Determination**
2. **Exhibit B: Letter from Reverend Joshua Maçon Pawelek, Unitarian Universalist Society East**

CERTIFICATE OF SERVICE

This is to certify that on June 10, 2013, I caused a true and correct copy of the foregoing **Motion for Bond Redetermination** to be served on John P. Marley, counsel for the Department of Homeland Security via mail at the Trial Attorney Unit, U.S. Department of Homeland Security, A.A. Ribicoff Federal Building, Room 483, 450 Main Street, Hartford, CT 06103.



Tassity Johnson
Jerome N. Frank Legal Services Organization
Yale Law School
P.O. Box 209090
New Haven, CT 06520-9090

Counsel for Respondent

EXHIBIT P

IMMIGRATION COURT
450 MAIN ST., ROOM 628
HARTFORD, CT 06103

JEROME FRANK LEGAL ORGANIZATION - YALE LAW SCHOOL
WISHNIE, MICHAEL
P.O. BOX 209090
NEW HAVEN, CT 06520

FILE: A035-973-579

RE: REID, MARK

NOTICE OF CUSTODY REDETERMINATION HEARING IN IMMIGRATION PROCEEDINGS

PLEASE TAKE NOTE THAT THE ABOVE CAPTIONED CASE HAS BEEN
SCHEDULED/RESCHEDULED FOR A CUSTODY REDETERMINATION HEARING BEFORE THE
IMMIGRATION COURT ON Jun 13, 2013 AT 2:00 P.M. AT THE FOLLOWING ADDRESS:

450 MAIN ST., ROOM 628
HARTFORD, CT 06103

YOU MAY BE REPRESENTED IN THIS PROCEEDING, AT NO EXPENSE TO THE GOVERNMENT, BY
AN ATTORNEY OR OTHER INDIVIDUAL AUTHORIZED AND QUALIFIED TO REPRESENT PERSONS
BEFORE AN IMMIGRATION COURT. IF YOU WISH TO BE REPRESENTED, YOUR ATTORNEY
OR REPRESENTATIVE SHOULD APPEAR WITH YOU AT THIS HEARING.

CERTIFICATION OF SERVICE

THIS DOCUMENT WAS SERVED BY: MAIL (M) PERSONAL SERVICE (P)
TO: ☐ ALIEN ☐ ALIEN c/o Custodial Officer ☐ ALIEN's ATT/REP ☐ DHS
DATE: 6.12.13 BY: COURT STAFF ss
Attachments: ☐ EOIR-33 ☐ EOIR-28 ☐ Legal Services List ☐ Other

U7

EXHIBIT Q

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
450 MAIN ST., ROOM 628
HARTFORD, CT 06103

John P. Marley
Senior Attorney
Chief Counsel
DHS-ICE-OCC
450 Main St. Rm 483
Hartford, CT 06103

Date: Jun 13, 2013

File A035-973-579

In the Matter of:
REID, MARK

Attached is a copy of the written decision of the Immigration Judge. This decision is final unless an appeal is taken to the Board of Immigration Appeals. The enclosed copies of FORM EOIR 26, Notice of Appeal, and FORM EOIR 27, Notice of Entry as Attorney or Representative, properly executed, must be filed with the Board of Immigration Appeals on or before _____. The appeal must be accompanied by proof of paid fee (\$110.00).

Enclosed is a copy of the oral decision.

Enclosed is a transcript of the testimony of record.

You are granted until _____ to submit a brief to this office in support of your appeal.

Opposing counsel is granted until _____ to submit a brief in opposition to the appeal.

X Enclosed is a copy of the order/decision of the Immigration Judge. IJ'S RULING ON DHS MOTION TO CONTINUE/NEW HEARING NOTICE. All papers filed with the Court shall be accompanied by proof of service upon opposing counsel.

Sincerely,

ss
Immigration Court Clerk

UL

cc:

JEROME FRANK LEGAL ORGANIZATION - YALE LAW SCHOOL
WISHNIE, MICHAEL
P.O. BOX 209090
NEW HAVEN, CT 06520

United States Department of Justice
Executive Office for Immigration Review
Immigration Court
Hartford, Connecticut

In the Matter of: REID, Mark

A Number: 035 973 579

ORDER OF THE IMMIGRATION JUDGE

Upon consideration of DHS's motion to continue, it is HEREBY ORDERED that the motion be GRANTED DENIED because:

DHS does not oppose the motion.

The respondent does not oppose the motion.

A response to the motion has not been filed with the court.

X Good cause has been established for the motion.

The court agrees with the reasons stated in the opposition to the motion.

The motion is untimely per

Other:

Deadlines: Mand Redetermination hearing is
scheduled for Monday June 17, 2013
at 2:30pm

The application(s) for relief must be filed by _____.

The respondent must comply with DHS biometrics instructions by _____.

June 13, 2013
Date

W. Veith
Immigration Judge

Certificate of Service
This document was served by: ☒ Mail ☒ Personal Service
To: ☐ Alien ☐ Alien c/o Custodial Officer ☒ Alien's Atty/Rep ☐ DHS
Date: 6.13.13 By: Court Staff SS

EXHIBIT R

IMMIGRATION COURT
450 MAIN ST., ROOM 628
HARTFORD, CT 06103

JEROME FRANK LEGAL ORGANIZATION - YALE LAW SCHOOL
WISHNIE, MICHAEL
P.O. BOX 209090
NEW HAVEN, CT 06520

FILE: A035-973-579

RE: REID, MARK

NOTICE OF CUSTODY REDETERMINATION HEARING IN IMMIGRATION PROCEEDINGS

PLEASE TAKE NOTE THAT THE ABOVE CAPTIONED CASE HAS BEEN
SCHEDULED/RESCHEDULED FOR A CUSTODY REDETERMINATION HEARING BEFORE THE
IMMIGRATION COURT ON Jun 17, 2013 AT 2:30 P.M. AT THE FOLLOWING ADDRESS:

450 MAIN ST., ROOM 628
HARTFORD, CT 06103

YOU MAY BE REPRESENTED IN THIS PROCEEDING, AT NO EXPENSE TO THE GOVERNMENT, BY
AN ATTORNEY OR OTHER INDIVIDUAL AUTHORIZED AND QUALIFIED TO REPRESENT PERSONS
BEFORE AN IMMIGRATION COURT. IF YOU WISH TO BE REPRESENTED, YOUR ATTORNEY
OR REPRESENTATIVE SHOULD APPEAR WITH YOU AT THIS HEARING.

CERTIFICATION OF SERVICE

THIS DOCUMENT WAS SERVED BY: MAIL (M) PERSONAL SERVICE (P)
TO: ☐ ALIEN ☐ ALIEN c/o Custodial Officer ☐ ALIEN's ATT/REP ☐ DHS
DATE: 6.13.13 BY: COURT STAFF SS
Attachments: ☐ EOIR-33 ☐ EOIR-28 ☐ Legal Services List ☐ Other

U7

EXHIBIT S

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
HARTFORD, CT

FILE: A035-973-579

IN THE MATTER OF:

REID, MARK

RESPONDENT

IN REMOVAL PROCEEDINGS

ORDER OF THE IMMIGRATION JUDGE
WITH RESPECT TO CUSTODY

Request having been made for a change in the custody status of respondent pursuant to 8 CFR 236.1(c), and full consideration having been given to the representations of the Department of Homeland Security and the respondent, it is hereby

☒ ORDERED that the request for a change in custody status be denied.

☐ ORDERED that the request be granted and that respondent be:

☐ released from custody on his own recognizance

☐ released from custody under bond of \$

☒ OTHER Respondent is subject to Mandatory Detention pursuant to INA section 236(c)

Copy of this decision has been served on the respondent and the Department of Homeland Security.

APPEAL: waived -- reserved

HARTFORD -- HARTFORD, CONNECTICUT

Date: Jun 17, 2013

Philip Verillo
PHILIP VERILLO
Immigration Judge

XS

EXHIBIT T

October 26, 2012

To Whom it May Concern;

I am writing this letter on behalf of Mark A. Reid. My name is Michelle Turner, and Mark is my daughter's father.

My interest in Mark's remaining in the United States is simply because he has two children: an adult son, [REDACTED] (not my son) and M [REDACTED]. Both who love their father deeply, and would be devastated if they didn't have constant access to their father. I write on M [REDACTED] behalf, because she doesn't know her father's situation. My daughter is the quintessential "Daddy's Girl". Her father has meant everything to her. And in the beginning of my pregnancy, I almost miscarried. Mark took care of me the whole weekend. He then went to work, was chosen by a foreman to attend a state program which trained him in asbestos removal, and became a supervisor of a crew. Mark was there when she was born; he babysat her as I worked and went to graduate school.

They have developed a relationship where they fully understand one another. I know for certain that Mark deeply loves M [REDACTED]. Despite whatever was going on his life, Mark tried to make time for M [REDACTED]. Even when Mark worked in real estate, he would take M [REDACTED] to work with him for a few hours on the weekends to teach her about his job, and the value of work.

Mark has made choices that have disrupted his relationship with M [REDACTED]. I have never told her he was in prison, and as she has gotten older, I suspect she has an idea where he is. But just her not being able to see him has taken a toll on her. She once expressed she couldn't understand why her father goes away and never comes back. While she is an excellent student who has finished one of New Haven's finest schools, has traveled to China and excelled in sports, [REDACTED]

[REDACTED] I suspect this is because she doesn't understand why her father is no longer around. I have never taken her to visit Mark during his incarceration, because I know M [REDACTED] would be absolutely devastated. It would hurt her greatly to see him in prison, and the fact that he could not walk out of there with her would shake her to the core.

Again, Mark is a smart man who has made some really terrible choices. I left him during my pregnancy. But I never kept my daughter from her father. If Mark is deported, my daughter, who will be 16 in three months, will be another child without a Dad. She will not have access to her Dad. I believe in second chances, and I believe Mark and M [REDACTED] deserve a second chance to work through their relationship and get it back on track. While I pride myself on being a pretty decent Mom, I can't be her Dad. I can't offer a male perspective on life nor the guidance that a father can give. And while I love my daughter infinity times google, the love of a Dad is something that I can't replace. I sincerely hope that you will let Mark remain in the United States, so he can re-establish ties with his children and gain the opportunity to become a solid, productive citizen.

Thank You,

Michelle R. Turner
Michelle R. Turner

EXHIBIT U



National Personnel Records Center

Military Personnel Records, 9700 Page Avenue St. Louis, Missouri 63132-5100

January 19, 2012

MARK REID #141754
C.R.C.I
285 SHAKER RD
ENFIELD, CT 06082

RE: Veteran's Name: REID, Mark
 SSN/SN:
 Request Number: 1-10411889490

Dear Sir or Madam:

Thank you for contacting the National Personnel Records Center. We are pleased to respond to your request by providing the enclosed document(s).

Separation documents may include the following information: the type and character of discharge, authority and narrative reason for separation, reenlistment eligibility code, and separation program designator/number. If you require a copy of the separation document that does not contain this information, a "*deleted*" copy must be requested from this Center. A seal has been affixed to the separation document to attest to its authenticity.

DD Form 214, *Report of Separation*, is issued when a service member performs active duty or at least 90 or more consecutive days of active duty training. The enclosed separation document will verify the veteran's initial period of active duty for training. Because subsequent periods of active duty for training were less than 90 days, no additional separation documents were issued.

If you have questions or comments regarding this response, you may contact us at 314-801-0800 or by mail at the address shown in the letterhead above. If you contact us, please reference the Request Number listed above. If you are a veteran, or a deceased veteran's next of kin, please consider submitting your future requests online by visiting us at <http://vetrecs.archives.gov>.

Sincerely,

JONATHAN KNORR
Archives Technician (1B)

Enclosure(s)



**We Value Our
Veterans' Privacy**

*Let us know if we have
failed to protect it.*

ANY ALTERATIONS IN SHADED
AREAS RENDER FORM VOID

CAUTION: NOT TO BE USED FOR IDENTIFICATION PURPOSES		SAFE GUARD IT		AREAS RENDERING FORM VOID	
DD FORM 1 JUL 79 214		PREVIOUS EDITIONS OF THIS FORM ARE OBSOLETE.		CERTIFICATE OF RELEASE OR DISCHARGE FROM ACTIVE DUTY	
1. NAME (Last, first, middle) ROTH, MARK ANTHONY		2. DEPARTMENT, COMPONENT AND BRANCH ARMY/USAR		3. SOCIAL SECURITY NO. [REDACTED]	
4. GRADE, RATE OR RANK E-1	5. DATE OF BIRTH 640407	6. PLACE OF ENTRY INTO ACTIVE DUTY NEW HAVEN CT			
7. LAST DUTY ASSIGNMENT AND MAJOR COMMAND GO C 6TH BN 1ST ITB, USAIC, TRADOC, TC		8. STATION WHERE SEPARATED FORT BENNING, GEORGIA			
9. COMMAND TO WHICH TRANSFERRED GO A 3/35 INF SPRINGFIELD MA 01104		10. SGU COVERAGE AMOUNT \$ <u>35</u> 000 ☐ NONE			
11. PRIMARY SPECIALTY NUMBER, TITLE AND YEARS AND MONTHS IN SPECIALTY (Additional specialty numbers and titles involving periods of one or more years) 11B10 Infantryman 00 Yrs and 00 Mos.		12. RECORD OF SERVICE		YEAR(s)	MON (s)
		a. Date Entered AD This Period		84	04
		b. Separation Date This Period		84	07
		c. Net Active Service This Period		00	03
		d. Total Prior Active Service		00	00
		e. Total Prior Inactive Service		00	13
		f. Foreign Service		00	00
		g. Sea Service		00	00
h. Effective Date of Pay Grade		84	04		
i. Reserve Oblig. Term. Date		90	04		
13. DECORATIONS, MEDALS, BADGES, CITATIONS AND CAMPAIGN RIBBONS AWARDED OR AUTHORIZED (All periods of service) MARKSMAN (M-16) MARKSMAN (HAND GRENADE) ASR					
14. MILITARY EDUCATION (Course Title, number weeks, and month and year completed) NA					
15. MEMBER CONTRIBUTED TO POST-VIETNAM ERA VETERANS' EDUCATIONAL ASSISTANCE PROGRAM ☐ YES ☒ NO		16. HIGH SCHOOL GRADUATE OR EQUIVALENT ☐ YES ☒ NO		17. DAYS ACCRUED LEAVE PAID 8.5	
18. REMARKS: NOTHING FOLLOWS					
19. MAILING ADDRESS AFTER SEPARATION 723 ELM ST NEW HAVEN CT 06511				20. MEMBER REQUESTS COPY 6 BE SENT TO ☒ DIR. OF VET AFFAIRS ☐ NO	
21. SIGNATURE OF MEMBER BEING SEPARATED Mark A Roth		22. TYPED NAME, GRADE, TITLE AND SIGNATURE OF OFFICIAL AUTHORIZED TO SIGN W. A. RAWLSON, CW4, USA, Assistant AG			

SPECIAL ADDITIONAL INFORMATION (For use by authorized agencies only)		
23. TYPE OF SEPARATION Relief from Active Duty Training	24. CHARACTER OF SERVICE (Includes upgrades) Honorable	
25. SEPARATION AUTHORITY: Self-terminating Orders 64-4 OSUT dated 840404	26. SEPARATION CODE LBK	27. REENLISTMENT CODE RE-NA
28. NARRATIVE REASON FOR SEPARATION Completion of period of Active Duty Training.		
29. DATES OF TIME LOST DURING THIS PERIOD None	30. MEMBER REQUESTS COPY 4 MR INITIALS	

ENLISTMENT / REENLISTMENT DOCUMENT - ARMED FORCES OF THE UNITED STATES**A. IDENTIFICATION DATA**

1. NAME (Last-First-Middle-Jr-Sr-etc.) REID MARK ANTHONY		2. SSN [REDACTED]	3. DATE OF ENL/REENL 4 APR 1984	4. GRADE PV 1 E-1
5. HOME OF RECORD (City, State, ZIP Code) NEW HAVEN CT 06511		6. PLACE OF ENLISTMENT/REENLISTMENT NEW HAVEN CT		
7. DATE OF BIRTH 7 APR 1964	8. SELECTIVE SERVICE NO. ☐ NOT REGISTERED	9. PREV MIL SVC UPON ENL/REENL	YEARS	MONTHS
		a. Total Active Military Service	00	00
		b. Total Inactive Military Service	00	00

B. AGREEMENTS

10. I am enlisting/reenlisting in the United States ARMY RESERVE
 this date for 6 years beginning in pay grade E-1. The additional details of my enlistment/reenlistment are in
 Section C and Annex(es) A

a. FOR ENLISTMENT IN A DELAYED ENTRY/ENLISTMENT PROGRAM (DEP), I understand
 that I will be ordered to active duty as a Reservist unless I report to the place shown in item 6 above by _____

_____ for enlistment in the Regular Component of the United States
 (time and date)

_____ for not less than _____ years. My enlistment in the DEP is in a nonpay status. I
 understand my period of time in the DEP is creditable for pay purposes upon enlistment on active duty. I also understand that this
 time is NOT counted toward fulfillment of my military service obligation or commitment. I must maintain my current
 qualifications, and keep my recruiter informed of any changes in any physical or dependency status, moral qualifications, or
 mailing address.

b. Remarks: (If none, so state.)

THIS FORM REGISTERS ME UNDER THE MILITARY SELECTIVE
 SERVICE ACT. MY NAME, SSN, DATE OF BIRTH AND ADDRESS MAY BE SENT TO THE
 SELECTIVE SVC SYSTEM FOR REGISTRATION/INFORMATION REPORTING REQUIREMENTS.

c. The agreements in this section and the attached annex(es) are all the promises made to me by the Government.
ANYTHING ELSE ANYONE HAS PROMISED ME IS NOT VALID AND WILL NOT BE HONORED.

m. A. R.
 (Initials of Enlistee/Reenlistee)

C. PARTIAL STATEMENT OF EXISTING UNITED STATES LAWS

11. **FOR ALL ENLISTEES OR REENLISTEES:** Many laws, regulations, and military customs will govern my conduct
 and require me to do things a civilian does not have to do. The following statements are not promises or guarantees of any kind.
 They explain some of the present laws affecting the Armed Forces which I cannot change but which Congress can change at any
 time.

a. My enlistment is more than an employment agreement. As a member of the Armed Forces of the United States, I will
 be:

(1) Required to obey all lawful orders and perform all assigned duties.

(2) Subject to separation during or at the end of my enlistment. If my behavior fails to meet acceptable military
 standards, I may be discharged and given a certificate for less than honorable service, which may hurt my future job oppor-
 tunities and my claim for veteran's benefits.

(3) Subject to the military justice system, which means, among other things, that I may be tried by military courts-
 martial.

(4) Required upon order to serve in combat or other hazardous situations.

CONTINUED ON PAGE 2 - REVERSE SIDE

D. CERTIFICATION AND ACCEPTANCE (Continued from page 2)		
GUARANTEES MADE TO ME BY ANYONE ARE WRITTEN BELOW: (If none, check "NONE" and initial.) ☒ NONE <u>M.A.R.</u>		
14a. TYPED NAME/SSN OF APPLICANT/REENLISTEE <u>MARK ANTHONY REID</u> 	14b. SIGNATURE OF APPLICANT/REENLISTEE 	
15. On behalf of the United States <u>ARMY</u> , I accept this applicant for enlistment. I have witnessed the signature in item 14b to this document. I certify that I have explained that only those agreements in Section B of this form and in the attached Annex(es) will be honored, and any other promises made by any person are not effective and will not be honored.		
15a. NAME, GRADE, SSN, AND ORGANIZATION OF SERVICE REPRESENTATIVE (Type or Print) <u>CHARLES L. MOHAN SFC</u> <u>USAR NHDRC</u>	15b. SIGNATURE OF SERVICE REPRESENTATIVE 	15c. DATE SIGNED 04 APR 84
E. CONFIRMATION OF ENLISTMENT OR REENLISTMENT		
16a. FOR SERVICE IN THE ARMED FORCES <u>EXCEPT</u> THE NATIONAL GUARD (ARMY OR AIR): I, <u>MARK ANTHONY REID</u> , do solemnly swear (or affirm) that I will support and defend the Constitution of the United States against all enemies, foreign and domestic; that I will bear true faith and allegiance to the same; and that I will obey the orders of the President of the United States and the orders of the officers appointed over me, according to regulations and the Uniform Code of Military Justice. So help me God.		
16b. FOR ENLISTMENT OR REENLISTMENT IN THE NATIONAL GUARD (ARMY OR AIR): I, _____, do solemnly swear (or affirm) that I will support and defend the Constitution of the United States and the State of _____ against all enemies, foreign and domestic; that I will bear true faith and allegiance to the same; and that I will obey the orders of the President of the United States and the Governor of _____ and the orders of the officers appointed over me, according to law and regulations. So help me God.		
16c. I acknowledge that the oath above, as filled in, has been administered to me and that I have sworn (or affirmed) to the same.	16d. SIGNATURE OF ENLISTEE/REENLISTEE 	
16e. The above oath was administered; subscribed, and duly sworn to (or affirmed) before me this date.		
16f. NAME, GRADE, AND ORGANIZATION OF ENLISTING OFFICER (Type or Print) <u>KATHLEEN C CHEW CDR USN</u> <u>NEW HAVEN CT MEPS</u>	16g. SIGNATURE OF ENLISTING OFFICER 	16h. DATE SIGNED 04 APR 84
16i. FOR ENLISTMENT OR REENLISTMENT IN THE NATIONAL GUARD (ARMY OR AIR): I do hereby acknowledge to have voluntarily enlisted (reenlisted) this _____ day of _____ 19____ in the _____ National Guard of the State of _____ and as a Reserve of the United States _____ with membership in the _____ National Guard of the United States for a period of _____ years _____ months _____ days under the conditions prescribed by law, unless sooner discharged by proper authority.		
16j. SIGNATURE OF ENLISTEE/REENLISTEE 		

DEPARTMENT OF THE ARMY
U.S. ARMY RESERVE PERSONNEL CENTER
9700 PAGE BOULEVARD
ST. LOUIS, MO 63132-5260

28 MAR 90

DARP-PAT-R(N1)
ORDERS D-03-025255

REID MARK ANTHONY
49 WAVERLY
NEW HAVEN CT 06511

PAT-R(N1)

PV2
ANNUAL TRAINING

YOU ARE DISCHARGED FROM COMPONENT SHOWN.

AUTHORITY: AR 135-178
EFFECTIVE DATE: 3 APRIL 1990
COMPONENT: READY RESERVE

TYPE OF DISCHARGE: HONORABLE

ADDITIONAL INSTRUCTIONS: IF RESERVE IDENTIFICATION DD FORM 2A (RED) IS
IN YOUR POSSESSION, RETURN IT TO THIS HEADQUARTERS, ATTN: DARC-SH.
IF YOU HAVE ANY QUESTIONS IN THE FUTURE ABOUT YOUR MILITARY RECORDS OR
YOUR MILITARY SERVICE, CONTACT THE NATIONAL PERSONNEL RECORDS CENTER,
GENERAL SERVICES ADMINISTRATION, 9700 PAGE BOULEVARD, ST. LOUIS, MO
63132. AS YOU NO LONGER HAVE ANY MILITARY STATUS, YOUR RECORDS ARE NO
LONGER MAINTAINED BY THE DEPARTMENT OF THE ARMY. REMEMBER TO INCLUDE
YOUR FULL NAME, SOCIAL SECURITY NUMBER AND ALL PREVIOUS SERVICE NUMBERS,
SO THAT YOUR RECORDS CAN BE POSITIVELY AND QUICKLY IDENTIFIED.
FORMAT: 500

* ARPERCEN *
* OFFICIAL *

THOMAS J. KILMARTIN
BRIGADIER GENERAL, USA
COMMANDING

DISTRIBUTION: H5

"SUBJECT BEING DISCHARGED ALTHOUGH ASSIGNED TO THIS ORGANIZATION,
IS NOT PRESENT FOR DUTY. DISCHARGE CERTIFICATE AND DISCHARGE ORDERS
ARE BEING MAILED TO LAST KNOWN ADDRESS THIS DATE, 3 May 1990."



Certification of Military Service

Department of Veterans Affairs
Records Management Center
St. Louis Missouri

This certifies that

Mark A. Reid

Date of Birth: April 4, 1984

was a member of the United States

Army

Under Service Number [REDACTED]

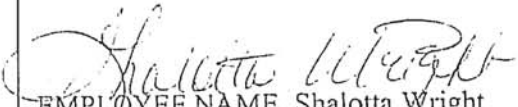
Entered Active Duty on April 17, 1984

Discharged on July 19, 1984

Received a(n) Honorable Discharge

Last Grade, Rank, or Rating: Private First Class

Given at St. Louis, Missouri on


EMPLOYEE NAME Shalotta Wright
Title Administrative Support Assistant
Division - Director's Office
VA Records Management Center

This Certification of Military Service is issued in the absence of a copy of the actual Report of Separation or its equivalent.
This document serves as verification of military service and may be used for any official purpose. Not valid without official signature.