

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA

CASE NO: 3:23CR00003-1

FILED
U.S. DISTRICT COURT
SAVANNAH, GA.

JUN 11 2024 11:01

UNITED STATES OF AMERICA

VS

GLADYS HARUN

PRO SE MOTION FOR MODIFICATION OF SENTENCE
UNDER AUTHORITY 18 U.S.C. 3582(C) (2)

Now comes prose petitioner Gladys Harun to ask this Honorable Court for a modification or reduction of her sentence under the authority of 18 U.S.C 3582 (C) (2) and 4C1.1. and pursuant to amendment to the sentencing Guidelines by the United States Sentencing Commission.

Petitioner was sentenced to 60 months on January 23 2024. Her total offense level was 18 and her criminal category was 1. Her sentencing guideline range was 27 to 33 Months. Petitioner's release date is 10/08/2026. Petitioner is currently incarcerated in Alderson Federal Prison Camp; One Glen Ray Road, Box A Alderson, West Virginia, 24910.

A.) ZERO-POINT OFFENDER

Petitioner Submits she is a zero point offender. She qualifies for a retroactive two point reduction.

Petitioner Asserts:

1. She did not Receive any criminal history points from a prior conviction;
2. Petitioner did not receive an adjustment under 3A1.4 (Terrorism);
3. Petitioner did not use Violence or credible threats of violence in connection with the offense;
4. The offense did not result in death or serious bodily injury;
5. The instant offense of conviction is not a sex offense;
6. Petitioner did not possess, receive, purchase, transport, transfer sell or otherwise dispose of a firearm or other dangerous weapon (or induce another participant to do so) in connection with the offense;
7. The instant offense of conviction is not covered by 2H1.1(offenses involving individual rights);
8. Petitioner did not receive an adjustment under 3A1.1 (Hate crime motivation or vulnerable victim) or (Serious Human

Rights Offenses)

9. Petitioner did not receive an adjustment under 3B1.1(Aggravating Role) and was not engaged in a continuing criminal enterprise, as defined in U.S.C 848

B.) POST- SENTENCING REHABILITATION PROGRAMMING

Petitioner has a clear conduct and has not had any disciplinary violation since incarceration. Petitioner has received various certificates during her programming and rehabilitation. Her Recidivism level is at a minimum which is the lowest as per BOP policy.

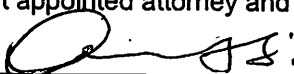
Petitioner could be considered for a reduction of sentence ; Pepper vs United States Supreme Court, 131 S Ct. 1229; 179 L ED 2d 196, 2001 U.S. Lexis 1902, argued December 6, 2010 decided March 2, 2011. The downward variance was based on Pepper's post-sentencing rehabilitation, as also with Booker Vs. United states Supreme Court 160 L ED 2d 621, 1255 S. Ct. 736 (2005), Gall Vs. United States 552 U.S 38 1285 Ct. 586, 169 L Ed @d 445, 2007 Lexis 13083, argued October 2, 2007, decided December 10, 2007. Judge Robert C. Chambers (4th Circuit) granted Terri L. Burns on July 16, 2012 under 18 U.S.C. 3742 (e) a 30 Month Sentence reduction for programming; Burns received 30 certificates while housed at Federal Prison Camp Alderson, WV.

A sentence reduction based on post-conviction rehabilitation can hardly be said to be inconsistent with the policies underlying an award of goodtime credit under 18 U.S.C 3624 (b) because the two serve distinctly different interest. An award of good time credit by the Bureau of Prisons (BOP) does not affect the length of court imposed sentences, rather it is an administrative reward to provide an incentive for prisoners to comply with institutional disciplinary regulations and such credits may be revoked at any time before the date of the prisoner's release 18 U.S.C 3624 (b) (2).

In contrast, a court's imposition of a reduced sentence based on post-sentencing rehabilitation changes the very terms of imprisonment and recognizes that the petitioner's conduct since her initial sentencing warrants less severe criminal punishment. Once imposed, a sentence may be modified only in very limited circumstances 18 U.S.C 3582 (c). Instead, the difference between the two is reflected most obviously in the fact that the BOP has no authority to award good time credit where the petitioner's good behavior occurs after a sentence has already been served. Wherefore, the petitioner humbly asks this honorable court to accept her certificates for programming and grant a reduction of sentence.

C.)

Petitioner hereby request a court appointed attorney and permission to proceed in forma pauperis.

Signature of the Petitioner 

Date: 05/27/2024

Print Name Gladys Harun

Federal Reg No: ~~090~~ 09407510

Current Address Po Box A, Anderson
WV 24910

Attached:

(a) Programming Certificates

(b) Recidivism document

FSA Recidivism Risk Assessment (PATTERN 01.03.00)

Register Number: 09407-510, Last Name: HARUN

U.S. DEPARTMENT OF JUSTICE

FEDERAL BUREAU OF PRISONS

Register Number: 09407-510

Inmate Name

Last.....: HARUN

First.....: GLADYS

Middle.....:

Suffix.....:

Gender.....: FEMALE

Risk Level Inmate.....: R-MIN

General Level.....: R-MIN (0)

Violent Level.....: R-MIN (-2)

Security Level Inmate: MINIMUM

Security Level Faci...: MINIMUM

Responsible Facility.: ALD

Start Incarceration...: 01/23/2024

DATE REVIEWED: 4.17.24

INSTITUTION:	<u>FPC Alderson</u>	UNIT:	<u>2 GP</u>
INMATE NAME:	<u>Harun, Gladys</u>	REG NO:	<u>09407-510</u>

FIRST STEP ACT (Circle One): ELIGIBLE / INELIGIBLE

RECIDIVISM RISK LEVEL (Circle One): MINIMUM LOW MEDIUM HIGH

Certificate of Completion

Gladys Harun

has successfully completed the First Step Act
Women's Basic Financial Literacy Program

This certificate is hereby issued this May day of 21st 2024

V. Booher

V. Booher, Special Population Program Coordinator

Certificate of Completion

Gladys Harun

has successfully completed the First Step Act
National Parenting Phase One Program

This certificate is hereby issued this 9th day of April 2024



V. Booher, Special Population Program Coordinator

Certificate of Completion

Gladys Harun

has successfully completed the First Step Act Women's
Aging Well

This certificate is hereby issued this 18th day of April 2024



V. Booher, Special Population Program Coordinator

Certificate of Completion

Gladys Harun

has successfully completed the First Step Act
Circle of Strength Program.

This certificate is hereby issued this 2nd day of April 2024



V. Booher, Special Population Program Coordinator

JJC Alderson Recreation

Certificate of Achievement

This Certifies That

GLADYS HARUN

has satisfactorily completed

NUTRITION

Consisting of 3 Hours of Training

Given at Alderson, WV, this 23RD day of APRIL, 2024



A handwritten signature in black ink, appearing to read "D. Morgan", written over a horizontal line.

RECREATION SPECIALIST D. MORGAN

JRC Alderson Recreation

Certificate of Achievement

This Certifies That

GLADYS HARUN

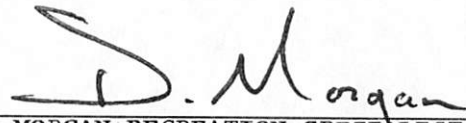
has satisfactorily completed

INTRODUCTION TO FITNESS

Consisting of 5 Hours of Training

Given at Alderson, WV, this 1ST day of MAY, 2024




D. MORGAN RECREATION SPECIALIST

AMERICAN BIBLE ACADEMY

Presents this Certificate to

Gladys Harun

upon successful completion of

Gospel of John

Awarded on 02/06/2024.



Joyce Wadell

ACADEMIC DEAN

Mrs. Helen Wadell

REGISTRAR



GRADE REPORT
AMERICAN BIBLE ACADEMY
P.O. BOX 1627
JOPLIN, MO 64802-1627

NAME: **Gladys Harun**

STUDENT ID#: 609979

COURSE: **Gospel of John**

DATE: 02/06/2024

EXAM 1: **92**

EXAM 2: **93**

EXAM 3: **94**

FINAL GRADE: **93**

CREDITS: NON-CREDIT

The grading system used by A.B.A. is as follows:

A+ ...100-99%	B+ ...89-87%	C+ ...79-77%	D+ ...69-67%	F ...59-0%
A98-95%	B86-84%	C76-74%	D66-64%	
A-94-90%	B-83-80%	C-73-70%	D-63-60%	

Please inform us of any changes in your mailing address.

AMERICAN BIBLE ACADEMY

Presents this Certificate to

Gladys Harun

upon successful completion of

Christian Doctrine - Vol. 1

Awarded on 03/12/2024.



Joseph M. Smith

ACADEMIC DEAN

Mrs. Helen Wadell

REGISTRAR



GRADE REPORT
AMERICAN BIBLE ACADEMY
P.O. BOX 1627
JOPLIN, MO 64802-1627

NAME: Gladys Harun

STUDENT ID#: 609979

COURSE: Christian Doctrine - Vol. 1

DATE: 03/12/2024

EXAM 1: 87

EXAM 2: 91

EXAM 3: 89

FINAL GRADE: 89

CREDITS: 1

The grading system used by A.B.A. is as follows:

A+ ...100-99%	B+ ...89-87%	C+ ...79-77%	D+ ...69-67%	F ...59-0%
A98-95%	B86-84%	C76-74%	D66-64%	
A-94-90%	B-83-80%	C-73-70%	D-63-60%	

Please inform us of any changes in your mailing address.

Websites: www.abarc.org • www.arm.org

