

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

FILED BY PCS D.C.

UNITED STATES OF AMERICA

Plaintiff(s)

V.

Criminal Case: 9:23CR80154-DMM

GREGORY SCOTT KEOUGH
BOP Inmate No. 72151-510

Defendant

MOTION REQUESTING A JUDICIAL RECOMMENDATION FOR MAXIMUM
HALFWAY HOUSE PLACEMENT

COMES NOW, the Defendant, Gregory Keough, pro se and unskilled in the field of law, and respectfully moves this Honorable Court to recommend that the Bureau of Prisons ("BOP") afford the Defendant the maximum Residential Re-entry Center ("RRC")/halfway house placement time of 12 months preceding the end of his sentence. In support thereof, Defendant states as follows:

1. Defendant was sentenced by this Court to a term of (30) months imprisonment followed by a term of (3) years of supervised release.
2. Pursuant to the Second Chance Act of 2007 ("SCA") the BOP may place a defendant into RRC/halfway house up to twelve months prior to his release date if it is determined that his placement in a halfway house is of "*sufficient duration to provide the greatest likelihood of successful reintegration into the community.*"
3. The criteria that the Bureau of Prisons is to consider in assessing an individual applicants' eligibility for up to twelve months of RRC/Halfway House are: any statement made by

the Court concerning the purposes that warranted a sentence to imprisonment and recommending the type of correctional facility that would be appropriate. 18 U.S.C. 3621(b)(4)(A), (B). The BOP is soliciting an opinion from the Court recommending early placement in a halfway house prior to release. An RRC/halfway house is a correctional facility with superior transitional programs to help inmates rebuild their ties to the community.

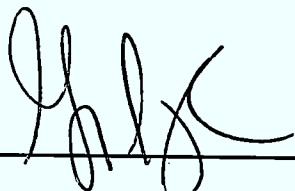
4. Movant is currently incarcerated at FPC Montgomery, Montgomery, AL. His release date is February 21, 2026, and an RRC placement will not affect this.
5. According to Federal Bureau of Prisons' Memorandum for Chief Executive Officers, June 24, 2010, (see **Exhibit 1: Revised Guidance for Residential Reentry Center (RRC) Placements**) Extended Pre-Release RRC/Halfway House time decisions "*are to focus on RRC placement as a mechanism to reduce recidivism.*"
6. Movant is 57 years old. He can be reformed and rejoin law-abiding society with the help available from prolonged placement at a federal halfway house.
7. The purpose of the Second Chance Act of 2007 is to improve the reintegration of offenders back into their respective communities and to reduce recidivism. While ultimately left to the discretion of the BOP, RRC/halfway house placement must be
(A) conducted in a manner consistent with section 3621(b) of this title;
(B) determined on an individual basis; and
(C) of sufficient duration to provide the greatest likelihood of successful reintegration into the community, 18 U.S.C. § 3624(c)(1)-(2).
8. The Attorney General of the United States and the Inspector General of the BOP have noted in reports and public statements that the BOP is underutilizing various programs

available, such as RRC/halfway house. It should also be noted that generous RRC/halfway house placement drastically reduces the cost of traditional incarceration.

WHEREFORE NOW, above premises considered, the defendant respectfully requests that this Honorable Court GRANT this motion and all relief requested herein, issuing a judicial recommendation to the BOP that the Defendant be granted the maximum placement time at a federal halfway house, reflecting the same and granting all other relief required by Law, Liberty, and Equity.

Done this 12th Day of September 2024.

Respectfully Submitted,

X 
GREGORY KEOUGH #72151-510

FPC MONTGOMERY

MAXWELL AFB

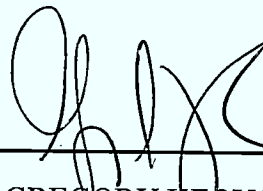
MONTGOMERY, AL 36112

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that I have served a copy of this pleading upon the Clerk of the Court, VIA US Mail, properly addressed, First-Class Postage prepaid. The accused further requests that a copy of this pleading be forwarded to all parties, VIA the CM/ECF System, as he is indigent, detained, and has no other means.

Done this 12th Day of September 2024.

Respectfully Submitted,

X 

GREGORY KEOUGH #72151-510

FPC MONTGOMERY

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Greg Hough
3600 N. Upland St.
Arlington, VA
22207

USMS INSPECTED



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BY _____

Clerk of the Court Southern District of Florida

Paul G. Rogers Federal Building and U.S. Courthouse

701 Clematis Street

Room 202

West Palm Beach, FL

33401



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