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Southern District  
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April 22, 2020

Via ECF

Honorable Ronnie Abrams  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: United States v. Haena Park, 16 CR 473 (RA)

Dear Judge Abrams:

I write to ask the Court to restore to the docket Ms. Park's Emergency Motion for Compassionate Release, ECF Dkt. 57, and grant it forthwith. Specifically, we respectfully urge the Court to promptly resentence Ms. Park to time served, with the remaining custodial portion of her sentence to be served on home confinement, so that Ms. Park can immediately be released from Danbury FCI where, as of yesterday, an inmate has succumbed to COVID-19, 20 others are infected with it, and 31 staff are positive with the virus.

Ms. Park moved before this Court for Compassionate Release on April 2, 2020. At the time, a similar request made directly to the BOP was pending. In response to Ms. Park's Compassionate Release motion, the government represented on April 10, 2020 that the BOP had granted Ms. Park's request to be transferred to home confinement. ECF Dkt. 57. As such, on April 10, 2020, the Court ordered that "in light of the Bureau of Prisons' decision to approve Defendant Haena Park's request to be transferred to home confinement pursuant to 18 U.S.C. 3624(c), see Dkt. 62, the Court will not further address her motion for a sentence reduction pursuant to 18 U.S.C. 3582(c)(1)(A), see Dkt. 57, unless requested to do so." ECF Dkt. 63.

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Nearly 14 days later, Ms. Park remains detained at Danbury-FCI. While BOP officials originally represented that Ms. Park would be released on April 23, 2020 after she completed a 14-day quarantine in the facility, as of yesterday the BOP has not set a release date for Ms. Park and does not anticipate that she will be released tomorrow. Additionally, this week the Department of Justice issued to the Bureau of Prisons “new guidance” which changes the criteria for inmates who qualify for release. Many inmates whom the BOP approved release are now being denied release. It is unclear whether or how the new guidance will impact Ms. Park’s previously-approved release.

In light of the imminent and grave danger Ms. Park’s continued detention poses to her health and safety, we ask that the Court order her released forthwith and order that she serve the remainder of her custodial sentence on home confinement.

Thank you for your prompt attention to this emergency application and I hope you and your loved ones remain safe.

Respectfully submitted,

/s/ Julia Gatto

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cc: A.U.S.A. Christine Magdo (via ECF)