

THE LAW OFFICES OF LISA A. MATHEWSON, LLC

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April 4, 2020

*Via Electronic Mail<sup>1</sup>*

Warden, FCI Danbury  
Unit Team, Satellite Camp  
Federal Correctional Institution  
Route 37  
Danbury, CT 06811

Re: Inmate [REDACTED] Reg. No. [REDACTED]

Dear FCI Danbury:

I write to urge you to release my client [REDACTED] to home confinement immediately, pursuant to the directive issued yesterday by Attorney General William Barr.

Ms. [REDACTED] is 64 ½ years old (DOB [REDACTED]/55), and thus extremely vulnerable to severe illness and death from COVID-19. As explained below, she will be able to fully self-quarantine at home for 14 days without exposing any other vulnerable person to a risk of infection. This letter updates information in her Presentence Report to demonstrate that, below (*see n.3*).

Ms. [REDACTED] poses no risk of reoffending if released, nor is she otherwise a danger to the community. At her sentencing hearing the court stated its belief “that Ms. [REDACTED] through the experience that she has been through and will be through in the future will not commit further crimes.” Tr. of July 12, 2018 Sentencing Hearing, *U.S. v. [REDACTED]* (Crim. No. [REDACTED], E.D. Pa.), at 82:7-8. She complied with all conditions of release and was permitted to self-surrender to your institution, which she did as directed. She is a first-time offender and was convicted only of nonviolent offenses (theft and fraud, and false statements on tax returns).

If released to home confinement Ms. [REDACTED] would go immediately to her long-time home at [REDACTED] PA. There she would be able to follow CDC Guidelines for self-quarantine by people who actually have COVID-19, which are even more stringent than the guidelines for those who may have been

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<sup>1</sup> Electronic mail to [DAN/ExecAssistant@bop.gov](mailto:DAN/ExecAssistant@bop.gov), [REDACTED]@bop.gov (Counselor [REDACTED] Satellite Camp), with cc to [les.owen@bop.gov](mailto:les.owen@bop.gov) (Attorney Les Owen, BOP counsel, NERO).

FCI Danbury

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exposed.<sup>2</sup> She would be able to self-quarantine on the second floor of the four-story home, which consists entirely of two bedrooms and two bathrooms that are unoccupied.<sup>3</sup> See Second Revised Presentence Report at ¶95.

Though Ms. [REDACTED] 71-year-old husband, [REDACTED] also resides in the home, he recognizes the need for Ms. [REDACTED] to self-quarantine—including avoiding contact with him—for 14 days and is fully willing and able to honor it. His bedroom is on the fourth floor of the home, two floors above the room Ms. [REDACTED] would occupy. See *id.* Mr. [REDACTED] healthy thirty-two year-old son [REDACTED] also resides in the home and is willing and able to assist in the self-quarantine by, for example, bringing meals to Ms. [REDACTED] and handling her laundry. [REDACTED] will also pick her up at your facility if she is released.

For all of these reasons, Ms. [REDACTED] is the ideal candidate for immediate release to home confinement pursuant to Attorney General Barr's April 3, 2020 directive. Please let me know if you need additional information. Thank you.

Sincerely,

Lisa A. Mathewson

LAM/hs

Cc: Attorney Les Owen,  
NERO Consolidated Legal Center (via electronic mail)

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<sup>2</sup> See <https://www.cdc.gov/coronavirus/2019-ncov/if-you-are-sick/care-for-someone.html>.

<sup>3</sup> At the time of sentencing the rooms were occupied by Ms. [REDACTED]'s [REDACTED]. See Second Revised Presentence Report at ¶95. Neither resides in the home now, however. Ms. [REDACTED] passed away in July 2019. After her death Ms. [REDACTED] moved into [REDACTED] where other family members assist [REDACTED] with her special health needs.