

SUPREME COURT OF ARIZONA

STATE OF ARIZONA ex rel. RACHEL H.
MITCHELL, Maricopa County Attorney,

Petitioner,

v.

THE HONORABLE KATHERINE COOPER,
Judge of the SUPERIOR COURT OF THE
STATE OF ARIZONA, in and for the County
of Maricopa,

Respondent Judge,

LONNIE ALLEN BASSETT,

Real Party in Interest/Defendant

Arizona Supreme Court
No. CR-22-0227-PR

Arizona Court of Appeals
Division One
No. 1 CA-SA 22-0152

Maricopa County Superior
Court
No. CR2004-005097

**BRIEF OF *AMICUS CURIAE* KALEEM NAZEEM, LOUIS GIBSON,
SHAKUR ABDULLAH, AND GREG GREENWOOD SUPPORT OF REAL
PARTY IN INTEREST/DEFENDANT LONNIE BASSETT**

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INTERESTS OF AMICUS CURIAE

Amicus curiae Kaleem Nazeem, Louis Gibson, Shakur Abdullah, and Greg Greenwood (collectively, “the Formerly Incarcerated Youth”) are formerly incarcerated, out-of-state youth who were tried in adult court and received life sentences after being convicted of homicide offenses. Due to the U.S. Supreme Court’s decision in *Miller* and *Montgomery* and subsequent state legislation, these individuals received a meaningful opportunity to demonstrate their maturity and rehabilitation and were released on parole. Through sharing their personal stories, the Formerly Incarcerated Youth profiled herein provide compelling examples of reform and highlight the unique capacity for the rehabilitation of convicted youths.

At the time of Mr. Bassett’s incarceration, Arizona’s parole procedures acted merely as a system for executive clemency. *See Lynch v. Arizona*, 578 U.S. 613, 615 (2016). Thus, the State prevented Mr. Bassett from having a meaningful opportunity to demonstrate his maturation and rehabilitation—as the *amici curiae* have done—and seek release. This rule disregards the Eighth Amendment limitation on juvenile sentences recognized in *Graham v. Florida*, 560 U.S. 48 (2010), and its progeny.

INTRODUCTION

The Formerly Incarcerated Youth submit this brief in support of Real Party in Interest/Defendant Lonnie Bassett to share their stories as formerly incarcerated youth who have been released after serving life sentences for homicide offenses and

are now productive members of their communities. The rehabilitative potential of young people who have committed serious crimes is significant and real. Indeed, the Supreme Court recognized when it found that “children are constitutionally different from adults for purposes of sentencing” because of their “diminished culpability and greater prospects for reform.” *Miller v. Alabama*, 567 U.S. 460, 471 (2012).

Like Mr. Bassett, the formerly incarcerated youth highlighted below were convicted of homicide as children and received life sentences. However, unlike Mr. Bassett, these formerly incarcerated youth were given a chance to “demonstrate[]maturity and rehabilitation” through meaningful procedural protections at parole. *Miller*, 567 U.S. at 479 (quoting *Graham*, 560 U.S. at 73). Kaleem Nazeem, Louis Gibson, Shakur Abdullah, and Greg Greenwood are just four of the more than eight hundred individuals who have been released as a result of the Supreme Court’s decisions in *Miller* and *Montgomery v. Louisiana*, 577 U.S. 190 (2016).¹ They are now contributing meaningfully to their communities. They are not outliers, nor are their stories of redemption unique. Rather, they are living proof of a child’s capacity for positive growth and rehabilitation.

Through this appeal, the Court has an opportunity to ensure the *Miller* factors are appropriately applied below, and that juvenile sentencing laws comport with the

¹ *Ten Years After Miller v. Alabama*, EQUAL JUSTICE INITIATIVE (June 24, 2022), <https://eji.org/news/ten-years-after-miller-v-alabama/>

United States Constitution. Accordingly, the amici respectfully request this Court deny the State's petition for review and uphold Respondent Judge's finding that Mr. Bassett's sentencing was unconstitutional under *Miller* and *Jones*.

ARGUMENT

I. THE EIGHTH AMENDMENT REQUIRES PROTECTIVE TREATMENT FOR THE UNIQUE CHARACTERISTICS OF YOUTH AT PAROLE

The Supreme Court has repeatedly found that youthfulness inherently constitutes a mitigating factor, and thus characteristics of youth require distinct and protective treatment under the Eighth Amendment. In a series of opinions beginning with *Roper v. Simmons*, 543 U.S. 551 (2005), and continuing in *Graham*, *Miller*, and *Montgomery*, the Court held that children are categorically less culpable than adults for their actions and require more protective procedures for criminal sentencing. To reach this conclusion, the Court relied on “developments in psychology and brain science [that] continue to show fundamental differences between juvenile and adult minds.” *Graham*, 560 U.S. at 68 (citation omitted).

In particular, the Court relied on three developmental characteristics that distinguish children from adults. First, “children are more vulnerable to negative influences and outside pressures, including from their family and peers; they have limited control over their own environment and lack the ability to extricate

themselves from horrific, crime-producing settings.” *Montgomery*, 577 U.S. at 207 (quoting *Miller*, 567 U.S. at 471) (internal quotation marks omitted).

Second, “children have a lack of maturity and an underdeveloped sense of responsibility, leading to recklessness, impulsivity, and heedless risk-taking.” *Montgomery*, 577 U.S. at 207 (quoting *Miller*, 567 U.S. at 471) (internal quotation marks omitted); *see also Graham*, 560 U.S. at 68. Indeed, “the parts of the brain involved in behavior control continue to mature through late adolescence.” *Graham*, 560 U.S. at 68. Children, therefore, often “underestimate the risks in front of them and focus on short-term gains rather than long-term consequences.” Barry C. Feld, *The Youth Discount: Old Enough to Do the Crime, Too Young to Do the Time*, 11 Ohio St. J. Crim. L. 107, 116-17 (2013).

And third, “a child’s character is not as well formed as an adult’s; his traits are less fixed and his actions less likely to be evidence of irretrievable depravity.” *Montgomery*, 577 U.S. at 207 (quoting *Miller*, 567 U.S. at 471) (internal quotation marks omitted). As the Court explained in *Graham*, “[f]rom a moral standpoint it would be misguided to equate the failings of a minor with those of an adult, for a greater possibility exists that a minor’s character deficiencies will be reformed.” 560 U.S. at 68. The signature qualities of adolescence—among them impetuosity and recklessness—subside as children grow into adulthood, even for children who

commit serious crimes. *See Roper*, 543 U.S. at 570; *see also* Feld, 11 Ohio St. J. Crim. L. at 117.

Graham's directive that individuals sentenced as children be allowed to "demonstrate maturity and reform" necessarily implicates the need for meaningful parole procedures, as this sort of demonstration is not possible at trial. *Graham*, 560 U.S. at 79.

II. THE EXPERIENCES OF FORMERLY INCARCERATED JUVENILE LIFERS DEMONSTRATE THE REAL SUBSTANTIAL PROSPECT OF REFORM AND REHABILITATION

The Supreme Court's opinion in *Graham* was expanded upon in *Miller* and *Montgomery*, mandating that youth receive a "meaningful opportunity to obtain release." This led to the parole release of Kaleem Nazeem, Louis Gibson, Shakur Abdullah, and Greg Greenwood, among countless others, whose lives embody the reality that the "bad acts [they] committed as a teenager are not representative of [their] true character." *Graham*, 560 U.S. at 79. Not only do their experiences chronicle a child's capability for reform when given a chance, but they also highlight the importance of youth-specific procedures and considerations at parole. Each of these individuals had histories of violent crime but succeeded in becoming productive, law-abiding citizens. They were given an opportunity to demonstrate their maturation at parole hearings that considered their youth and rehabilitation with

substantive feedback. A process that does not include these protections is illusory and would condemn children to die in prison, destroying both the child's and society's ability to benefit from that growth and rehabilitation. The experiences of these four individuals demonstrate that even the prospect of parole can encourage one's personal, emotional, and educational growth; the hope of freedom sparked their willingness to dream of a life beyond prison walls. That hope encouraged not only good behavior in prison, but also sparked the desire to mentor others, enroll in educational programming, and become a role model. Their accounts are representative of hundreds of other formerly incarcerated youth across the country who were given an opportunity, through youth-specific parole proceedings, to demonstrate their rehabilitation. Their experiences should help this Court recognize the importance of these protections.

A Kaleem Nazeem

Kaleem Nazeem often says "I'm in the process of being and becoming." He views self-improvement as a constant effort, one he began in prison. Soon, Kaleem will celebrate five years of freedom. Before his release, he set concrete goals he wanted to accomplish. He wanted to enroll in college, write a book, travel, and connect with juvenile justice advocates who contributed to his release. He has achieved each of those goals. He wrote a book that is being printed, traveled to three different continents, received a degree in energy control from Arkansas State

University, and connected with the Campaign for the Fair Sentencing of Youth (“CFSY”). He advocates against mass incarceration and supports children facing the hardships that he did. In his free time, he loves restoring old cars and meeting new people. “My wife always tells me I never met a stranger,” Kaleem said. “I love to interact with people, I love hearing people’s stories.”

Kaleem has worked hard to overcome his childhood trauma. “I really never did have a childhood,” he reflects. When a facilitator in a prison therapy class asked him to think about the happiest moments he had as a child, he struggled to think of any. “The only true happy memory I have of my childhood is looking for scorpions and salamanders in the woods behind the projects. That’s the happiest I can remember being as a child,” Kaleem said.

Growing up in the housing projects in Arkansas with his mother and five siblings, Kaleem recalls witnessing a lot of crime. As a child, he stood helpless as he saw his mother being abused. When he was just nine years old, he witnessed a murder in his neighborhood. The violence around him instilled in him a survival mindset, and he became more aggressive: “If your hands weren’t big enough to hold it, others would take it from you.”

His mother worked all day, so Kaleem’s siblings raised each other. He initially loved school and had an appetite for learning, but the people around him did not encourage his academic success as “street smarts” were valued greater than “book

smarts.” So he began looking up to people in his neighborhood: “the street hustlers.” He started with petty theft, which escalated to stealing cars. Eventually, he began selling cocaine. After a drug deal gone wrong, Kaleem shot and killed a man who shortchanged and assaulted him. He was seventeen years old.

In the four months leading up to his trial, his appointed lawyer only visited him once. When his case proceeded to trial, a jury convicted him in a single day. Still, he didn’t comprehend the gravity of his situation. “Even when I got a life without parole sentence—this was 1990—in my child-like brain I was thinking, I’ll be out in 1999, I’ll catch the Prince party.”

Although he was initially steadfast in his “survival mindset,” he naturally matured in his mid-20s. His emotional development began when a prison meditation group challenged him to examine himself and his identity. Reflecting on his past; Kaleem began wondering: “Why do I get so mad when someone tries to take something from me? Why do I feel weak when I’m in a position where I can’t defend others I love?” His self-reflection and maturation solidified his resolve to set and meet goals for himself. He became a peer counselor for the prison’s substance abuse treatment program and began asking the administration to further his education. “When you have a [life without the opportunity for parole] sentence, they don’t allow you to take education programs,” Kaleem said. But the prison needed peer counselors. “I said, well, if I don’t have too much time to teach as a peer counselor,

I should be entitled to educational courses.” It worked. He enrolled in vocational programming. Later, he worked in the prison’s hobby craft program where he made purses and belts to sell.

At the same time, Kaleem took on a mentorship role, guiding younger men to serve their time in a healthy and productive way. The administration classified him as a role model inmate. Yet, he began to face the reality that he might die in prison. While grappling with his bleak reality, he suffered the loss of his niece. He fell into depression. Soon after, he found himself in solitary confinement for being involved in a fight. He hit his lowest point of his incarceration as he thought: “if my best day is living behind bars, I don’t want to live.” But while in confinement, he read a letter his niece had written him before she died. She told him she wanted to see him free. “That letter saved my life,” Kaleem said.

A few days later, a fellow inmate asked if he knew about the *Miller* decision and told him he could be free. First, he felt disbelief, then ambivalence, and ultimately hope—“When the ruling came out, it was like, you can reformulate your thoughts, hopes and dreams about being able to walk outside at nighttime, to have hopes and aspirations of being free.” Until that point, Kaleem had never seen someone serving life without the possibility of parole walk out of the prison alive. Energized by the dream of a life beyond the prison, he continued to serve as the role

model inmate, mentor others, and plan for the future. In 2018, his dream came true when the state of Arkansas released him after twenty-seven years.

Since then, he has appreciated every moment of his freedom. He is married, loves to travel the world, and advocates for other juveniles who find themselves in the same position he once was in. He works for DecARcerate, a restorative justice organization in Arkansas, as a movement builder. “I think people have the ability to rehabilitate themselves.” He, too, continues to grow and works on achieving old goals and crafting new ones. “I just feel everybody deserves a chance at life and when I reflect on my childhood... a lot of times, we say we’re given a second chance. When I look at my life, when I was released after doing 27 years and 11 months of incarceration, I feel this is really truly my first chance at really living.”

B Louis Gibson

Louis Gibson is a proud father, a public servant with the Orleans Public Defender’s Office, and a deep and thoughtful man. In his 40s, he enjoys freedom for the first time since his childhood. After serving a twenty-five-year sentence, he often reflects on what could have prevented him from going to prison. “Because of how I grew up being homeless as a kid, nothing could change it. I didn’t have a chance.”

Louis grew up in New Orleans with his mother and two sisters. His mother struggled with substance abuse, as did his older sister who began using drugs at fourteen years old. His father was in and out of prison and never around. Louis had

no other role model. As a child living in poverty, he felt the burden of supporting his family financially. When he was nine, he would go to the grocery store to wipe windows to bring money home to his family. While he performed well in school, his focus shifted around the fifth grade. “I realized I was poor. I had one pair of pants and two or three shirts. I was smart academically, but I knew school wasn’t for me because I knew I needed to make money,” Louis said. He stayed in school until the tenth grade—when he was incarcerated—but stopped doing schoolwork.

At the age of thirteen, Louis became “a product of [his] environment” and began selling drugs. He spent time with a group of guys who sold drugs in his neighborhood from the age of thirteen to seventeen. In the early ’90s, another group began challenging Gibson’s, seeking to sell drugs in the same neighborhood. On March 17, 1993, the feud had escalated into an all-out “war” with both groups shooting at each other at different locations throughout the city. The day’s violence culminated in a shootout that night outside a New Orleans nightclub, leaving one man dead. Louis was arrested and charged as an adult. He was seventeen years old.

Leading up to the trial, Louis said it didn’t feel real. “I didn’t believe it. I was really just naïve.” He was convicted of second-degree murder and sentenced to life without the possibility of parole. “In my mind I thought they’ve got to be mistaken.” He couldn’t comprehend the gravity of a life sentence; he was just a teenager.

He spent his first three years incarcerated at the Orleans Parish Prison before being sent to the Louisiana State Penitentiary at Angola. There, he initially gravitated towards people who reminded him of his friends from home. But Louis soon started looking to the future, rather than living in the past. “A lightbulb went off for me,” Louis said. He realized in his twenties that he wanted to improve his life.

He began taking classes in prison and enrolled in a literary arts class that changed the course of his life. Assigned to write a book report about the African American slave trade, he learned about history he had not previously known. “It opened my eyes because there was a lot of stuff I didn’t know about. I thought I was doing my people a disservice,” Louis said. He became determined to change his lifestyle. In 2000, he received his GED. “I felt pretty proud of accomplishing that. I thought it was pretty easy, I should’ve stayed in school.”

He also joined a substance abuse support group. At first, he admits, he was ashamed of his past. “I know it was a heavy burden on me. But I was sitting with this group of guys where we shared the same experiences. In my mind, I said if this is a burden on me, I know it’s a burden on them,” Gibson said. He grew up viewing vulnerability as a weakness, but in front of the support group, his mindset shifted. “It takes a strong individual to convince other people it’s okay to be vulnerable,” Louis said. After Louis opened up, other members of the group felt safe to share

their stories and release their burdens. “It strengthened our group as a whole and showed those guys it’s okay to be vulnerable.”

Louis’s emotional growth accompanied further academic success. He received his diploma in culinary arts, and after 11 years at Angola, he was transferred to the Louisiana State Police Barracks as a reward for good behavior. Initially, he worked there in the kitchen. Eventually, he was reassigned to work at the Baton Rouge airport, helping to clean and service state police aircrafts.

Despite his advancements and growth, it seemed he would die in prison. But, after the *Miller* and *Montgomery* opinions, Louisiana passed a law making juveniles parole eligible after serving 25 years. La. Stat. Ann. § 15:574.4. Louis was released from prison after twenty-five years. “I was shocked,” he said; he had spent his entire adult life incarcerated. Guided through reentry by the Louisiana Parole Project (“LLP”), he secured a driver’s license, a job, and a car. He eventually secured employment with the LPP where he mentored formerly incarcerated individuals and helped them find housing and jobs. Now, he serves on LLP’s Board of Directors.

More than three years after release, Louis is thriving. He is married and has a two-year-old son. He works for the Orleans Public Defender’s Office as a sentencing advocate, reviewing cases with multi-billed sentences and helping formerly incarcerated people integrate back into society. He knows first-hand that juveniles can be reformed: “We need to give kids a chance. As a kid, you’re going to think as

a kid. As an adult, you think as an adult. My mindset shifted in the prison... I matured inside of there, and all juveniles can mature.”

C Shakur Abdullah

Shakur Abdullah is a senior trainer at the Community Justice Center where he engages in restorative justice programming by visiting prisons throughout the state of Nebraska to share his story and provide guidance and hope to current inmates. But years ago, he was carrying out a death row sentence for a murder conviction he received at the age of the seventeen. While Shakur’s initial death row sentence was reversed for the failure to consider his age as a mitigating factor, his remained in prison for life without the possibility of parole until the Supreme Court’s *Miller* and *Jones* decisions granted him a second chance at the age of 58.

Growing up in Omaha, Nebraska, both Shakur’s mother and father worked to provide for him and his five siblings. Looking back, he has a greater appreciation for his upbringing at home, knowing that many other children in his neighborhood were physically and emotionally abused. But it was the realities of life outside his home at that time that had the greatest impact on him. Shakur struggled to find his identity in a racially charged society. To cope with the confusion of the racial inequities and social issues he witnessed daily in his neighborhood, Shakur turned to drugs when he was in middle school. In junior high school, things escalated; he started selling drugs and getting involved in “other aspects of criminal behavior”

which he now recognizes was a “selfish, narrow-minded effort” to change his social and economic status in his neighborhood. Then, in high school, Shakur was expelled for a marijuana joint that was found in his locker and was put in an independent study center where he and other suspended student “were left to [their] own devices.” Retrospectively, Shakur recognizes the negative impact this had on him as he was placed in a group of children who were more steeped into drugs and crime without supervision. Soon after his return to high school, he was arrested for murder at sixteen years old, and subsequently sentenced to death row at seventeen years old. Being sentenced to death as a teenager made him feel like “a throw away, marginalized, not worthy to live. Certainly not valued like other people.”

But Shakur’s perception of his life and future changed in prison when he met other inmates who were successfully working their way out of life sentences. “They really became like surrogate fathers and uncles and brothers and extremely close friends”—they sowed the seeds of hope of the real possibility of a life outside of prison. Indeed, looking back, “meeting them was really something that I needed because at that point I really didn’t know it was possible to get to the end of a life sentence,” Shakur said. It was through their guidance that he gained confidence, matured, and helped him get his “mind in a place to navigate a life sentence” in way that strengthened his desire to better himself. From prison, Shakur went back to school and proudly earned his GED. He also enrolled in vocational, self-betterment,

and college classes. Shakur then began studying the law, after spending countless hours in the law library he became a legal aid—helping other individuals with their cases. These experiences “built up [Shakur’s] self-esteem” and sense of purpose.

Exactly 41 years after his conviction, Shakur was set free. Since his release, Shakur has helped other individuals reintegrate into society as a reentry specialist for ReConnect Inc. Now, he is senior trainer at the Community Justice Center where he provides restorative justice programming and education to individuals and groups in the community and justice involved individuals in county jails, probation reporting centers and all ten prisons throughout the State of Nebraska. He even visits the same prison he swore as a child he would “never voluntarily step back foot in.” But Shakur no longer has the “selfish, narrow-minded” mentality he had when he started his sentence. He strives to “do what was done for [him], and to give back” because like the mentors that guided Shakur in his personal development, he believes that those who have “gone to prison for what society deemed horrible things, that did not make them the sum of who they are.”

Today, when Shakur is not working or helping care for his mother who suffers from dementia, he enjoys travelling to new places and experiencing new things—after 41 years in prison, he is living to the fullest while giving back in the process.

D Greg Greenwood

Greg Greenwood appreciates the simple things in life. He's working towards his associate's degree in metal working and applied sciences, he published a book about his life called *Love Locked Away*, and he's getting married in October. "I don't need big extravagant things," he said. "I just want to savor all the small things:" the ability to look at the night sky, being in his own home, having his own car. For most of his life, those joys felt unattainable. He was incarcerated at the age of 16, sentenced to life without the possibility of parole.

Greg grew up in rural Mississippi with his parents and three siblings. But when his parents divorced when he was twelve, his life became tumultuous. His mother moved the children around from town to town, ultimately settling in Jackson, Mississippi. "I was just a country boy when I came to Jackson." The other kids his age were "city slickers." Instead of fishing and hunting, the kids in his neighborhood would steal and break into cars. "I got caught up in their culture," he said. Greg's mom worked two jobs while attending school; as a newly single mother, she was unable to watch over and support Greg and his siblings by herself.

In 1996, when Greg was 16 years old, he was with a group of friends who were all under the influence of drugs and alcohol. When they got into an argument, it turned violent, and an innocent bystander was killed. Greg was charged with murder, along with two other codefendants. It took two and a half years for his case

to go to trial. In 1998, he was tried as an adult and convicted. The judge sentenced him to life without the possibility of parole.

“I did not understand the sentence the judge had just handed down to me... that life meant I would never get out of prison,” Greg said. At that time he could not comprehend the seriousness of his circumstances. “I did not understand that I had just thrown my life away. I did not understand the gravity of taking another life.”

He did not come to terms with his sentence until his late 20s. Initially, he admits, he misbehaved and caused trouble in prison. “I would do things to keep my mind off of having to think I was never getting out.” Still, he recognized how cruel and inhumane the conditions of confinement were. Greg began writing letters to various non-profit organizations to shed light on the horrors occurring at Mississippi State Penitentiary, also known as Parchman. Only one person ever responded to him—Margaret Winter, Associate Director of the ACLU’s National Prison Project. “She became a godmother to me,” Greg said. Winter traveled to Mississippi to investigate what was going on in the prison. “That was the most instrumental thing for me because I finally had someone who believed enough in me to find out what’s going on,” Greg said. Her belief and support shifted his mindset “away from looking at everything in this dark negative light.”

In February 2012, Greg was transferred to federal custody. The move, he said, continued his journey of personal growth. “I was given a clean slate,” he said. While

in the federal prison system, he took courses in conflict resolution, data entry, carpentry, Microsoft Word and Excel, entrepreneurship, and business administration. “Everything I could do, I did,” Greg said. “I’d been locked up before the age of computers, so every opportunity to learn about technology, I was there.” He began feeling hopeful for his own future when the U.S. Supreme Court handed down its decision in *Roper*, banning death sentences for minors.

After the *Miller* opinion, Greg believed his release was imminent, but years passed without any forward momentum. Yet he still kept the faith, working every day to better himself in case a judge decided to reexamine his case. “I worked, I went to school, I minded my business,” Greg said. In a federal prison in California, he secured a job working in the administrative offices, keeping offices clean and advising the warden how to keep the peace. He began mentoring other people, touting the advantages of a healthy, peaceful lifestyle.

Even after the *Montgomery* decision, he remained behind bars. He faced yet another hurdle of convincing the parole board he had been rehabilitated. The first time, they denied him. Still, he continued “staying out of trouble, staying out of the prison politics, participating in programming, mentoring.” He wanted to do everything he could to prove he should be a candidate for freedom. His good behavior awarded him a transfer to a federal prison closer to home: FCI Yazoo City in Mississippi. There he began meditating. “I began to construct what I wanted to

do. It gave me my time to sit back and think. You're praying to be released, you want to come home, but what are you going to do when you get there?" He wrote his plans down: he wanted to start his own business, he wanted to start a non-profit, he wanted to go to school. In September 2021, he was approved for parole. He recalls when they took the handcuffs off him, when he saw the sun beaming as a free man, the look on his lawyer's face. "I still can't believe it."

Upon his release, he moved in with his brother and sister-in-law; there, he met his sister-in-law's best friend. She helped him acclimate to life outside of prison, and in October, they are getting married. "Coming home after 26 years is not an easy thing to do. She's my calm in the storm." Now, he's achieved the goals he wrote down in prison. He's enrolled in Hinds Community College in Mississippi, he formed a publishing business, he wrote a book, and he serves as a mentor with the Minority Male Leadership Initiative. He is also the co-founder of Brothers Organizing Safe Streets where he helps at-risk youth understand the consequences of criminal behavior. He believes that juveniles can mature and grow in prison as he did. He enjoys his life of freedom but doesn't take his release from prison for granted. "I would still be there if it wasn't for *Miller*."

CONCLUSION

For the reasons set forth above, the amici respectfully request that the Court grant the relief that the Real Party in Interest/Defendant Mr. Bassett is seeking.

Dated this 9th day of December, 2022.

By: /s/ Craig M. Waugh

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