

Dawn Roberson

From: Sunset
Sent: Friday, December 19, 2008 8:05 AM
To: Dawn Roberson
Subject: FW: TYC

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Cc:
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Sunset Advisory Commission:

I am appointed counsel for appeal of one "JM" here in Gregg County. Central to my appeal is that it violates 8th Am. to send a child to TYC-- ie, because of the chaos and reported abuses at TYC, it is cruel & unusual punishment to commit a child there. There's federal precedent going back to 1973 when Judge Justice made his findings in Morales v. Turman, 364 F.Supp. 166 (D.C. E.D.Tex., 1973). At trial I introduced copies of quar. rpts of OIG. Also, my client testified (at hrg on MNT) about his own personal experiences in TYC. I'm mailing in my brief today to 6th Court of Appeals. In my brief I am requesting the Court to take judicial notice of your recent report. I'm sending you a copy of my brief in Case No. 06-08-00087-CV, In the Matter of JM. Do you know of any organization that might be willing to look at this and file an amicus brief?

Thanks for your time,

Lew Dunn, Attorney at Law