

IN THE FLORIDA SECOND JUDICIAL CIRCUIT  
IN AND FOR LEON COUNTY, FLORIDA

AMERICAN CIVIL LIBERTIES  
UNION OF FLORIDA, INC.,

Plaintiff,

v.

FLORIDA DEPARTMENT OF  
CORRECTIONS,

Defendant.

Case No.:

**37 2019 CA 2747**

(Consolidate with 2020 CA 854)

Judge Cooper

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**ACLU MOTION TO COMPEL DISCOVERY**

Pursuant to Fla.R.Civ.P. 1.380, American Civil Liberties Union of Florida, Inc. (“ACLU”) requests an order compelling Florida Department of Corrections (“FDOC”) to provide requested written discovery:

**A. Background**

In the fall of 2019, the ACLU sought access to “[e]ach field or piece of information used to calculate the tentative release date,” held in FDOC’s database(s). Records Request (filed Nov. 19, 2019), at 2, ¶ 7. When FDOC did not provide public access, the ACLU sued.

On Jan. 14, 2020, FDOC belatedly provided the ACLU with 4 interrelated datasets (text (“.txt”) files) along with supporting tables describing codes used in those datasets. FDOC assures everyone these 4 datasets completely satisfy the

ACLU's request—they meaningfully provide the information it uses to calculate the tentative release dates and FDOC has nothing further. FDOC's Resp. (Jan. 31, 2020), ¶ 1. Yet, the ACLU raised raise numerous questions about the dataset's integrity, completeness, and descriptions. ACLU Reply (Feb. 5, 2020). This Court permitted discovery to flesh out these concerns. Order Permitting Discovery (June 10, 2020). The ACLU propounded discovery. FDOC responded in good faith to some discovery. But to other requests, FDOC has provided unresponsive answers or dodged the inquiries altogether. An order to compel is appropriate.

### **B. Ineligibility periods**

Some people incarcerated by FDOC are ineligible to receive gain time during a portion of their sentence. For example, under the 10-20-Life law, § 775.087, Fla. Stat., persons possessing or discharging a firearm during an offense must serve mandatory minimum sentences during which they are ineligible for gain time. § 775.087(2), Fla. Stat. This affects their tentative release date. Any gain time noted during this period of ineligibility will not advance the release date. Thus, FDOC uses ineligibility periods to calculate the tentative release dates.

Interrogatory No. D1<sup>1</sup>

The ACLU inquired about what fields in the provided datasets indicated these ineligibility periods, which it defined to “mean the portion or entity of an inmate’s sentence during which the inmate is ineligible for gain time.” ACLU’s 1<sup>st</sup> Composite Discovery Requests, *infra*, at 15. After all, FDOC did not provide a field called “ineligibility period” or anything similar. The ACLU asked:

1. Identify by name the dataset(s) and field(s) that indicate an inmate’s ineligibility period.

Interrog. No. D1, *infra* at 29. The ACLU defined “dataset” to mean those produced on Jan. 14, 2020. ACLU’s 1<sup>st</sup> Composite Discovery Requests, *infra*, at 15. Yet, instead of identifying any fields *in the datasets*, FDOC pointed the ACLU to numerous fields within a sundry of “screens” that are only available to a user of FDOC’s Offender Based Information System (OBIS), not the ACLU. Its answer is unresponsive.

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<sup>1</sup> On Jan. 7, 2021, the Court consolidated two cases. Because written discovery was propounded in both cases before consolidation, the “D” preceding a written request signifies it was propounded in *ACLU v. FDOC*, No. 2019 CA 2747 (“2019 **Data** Case”) as distinguished from “F” for discovery in *ACLU v. FDOC*, No. 2020 CA 854 (“2020 **Formula** Case”).

### **C. Concurrent/Consecutive Sentence Flags (Troy Hall)**

The ACLU raised concerns about some offenses FDOC identified as “concurrent.” ACLU’s Reply at 7-8. Whether a sentence runs concurrent or consecutive affects the tentative release date. The ACLU believes FDOC undoubtedly has, but did not provide, dispositive information about whether an offense is concurrent or consecutive. *Id.* It offered Troy Hall (FDOC No. 082137) as an example.

Hall is serving sentences for three criminal offenses. FDOC’s Corrections Offender Network, FDOC No. 082137, *infra* at 39.<sup>2</sup> FDOC admits “[e]ach of the three current, 5-year sentences of the inmate with FDOC No. 082137 ran consecutive.” Admission No. D3, *infra* at 26-27. It used Field P (the “concurrent or consecutive” field)<sup>3</sup> in the offense dataset (OFNSOUT.txt) to determine this. Interrogatory No. D6, *infra* at 30. Yet, Field P for each of Hall’s offenses is “CC.” Excerpt of OFNSOUT.txt, *infra* at 45. And “CC” means “concurrent,” as noted in the CHANOUT.txt code table, *infra* at 46, accompanying the data produced on

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<sup>2</sup> Available at <http://www.dc.state.fl.us/offenderSearch/detail.aspx?Page=Detail&DCNumber=082137&TypeSearch=AI>

<sup>3</sup> Along with the data produced on Jan. 14, 2020, FDOC provided Microsoft Word Document (ACLU DWNLD.docx) that specified the information within each field. Field P in the Offense file is the “concurrent or consecutive” field. *See* ACLU DWNLD.docx, *infra* at 43.

Jan. 14, 2020. Thus, FDOC says Hall’s sentences are consecutive, but the data FDOC provided reflects they are concurrent.

FDOC enters “concurrent/consecutive flags” into OBIS. *See* Prison Commitment Code Sheet (Form DC3-310), *infra* at 47. It uses these flags to calculate the tentative release dates. But the flags that FDOC provided in Field P are not the operative flags—FDOC does not rely on them to calculate the tentative release dates. Indeed, FDOC flagged only 1 offense as “consecutive” among the 52,210 offenses recorded for 13,047 people whose FDOC No. begins with the letters A–E. Thus, FDOC uses other field (or combination of fields) to calculate the tentative release dates. And FDOC leaves it to the ACLU to investigate whether each offense for each person runs concurrent or consecutive and to what other offense. FDOC has not provided this dispositive concurrent/consecutive information used to calculate the tentative release date.

Interrogatory No. D5

The ACLU propounded an interrogatory to discover what fields or information indicate whether a sentence runs concurrent or consecutive:

5. Identify by name the dataset(s) and field(s) that indicate whether a sentence runs concurrent or consecutive with another sentence.

Interrog. No. D5, *infra* at 30. The ACLU defined “dataset” to mean those produced on Jan. 14, 2020. *Infra*, at 15. Yet, instead of identifying any fields in the datasets, FDOC again pointed the ACLU to fields within an OBIS screen, not the datasets. The screen is unavailable to the ACLU. Its answer is unresponsive.

Admission No. D16

The ACLU also wanted to confirm it read Hall’s Field P field (“concurrent or consecutive”) correctly. It propounded a request for admission to make sure the Parties were on the same page:

16. For the inmate with FDOC No. 082137, each Field “P” (concurrent or consecutive) of the Offenses dataset (“OFNSOUT.txt”), see Interrog. Ans. 6, read “concurrent.”

Admission No. D16, *infra* at 36. FDOC refused to answer, citing its objections in Admission No. D15. *Id.* It begins that objection with the generic objection—the inquiry is “overbroad, vague, burdensome, and is not reasonably calculated.” *Id.* Additionally, it asserts that the discovery is “inconsistent with ... Chapter 119.”

*Id.* It maintains that it has no discovery obligations aside from producing requested, non-exempt records. *Id.* These objections are considered in turn.

FDOC says the request is “overbroad, vague, burdensome, and is not reasonably calculated.” *Id.* But it is hard to see why and FDOC does not explain. Furthermore, the request for admission is limited to specific information germane to this lawsuit—whether the provided data is complete and meaningful. FDOC’s unsupported objection should be rejected.

Chapter 119 defines the right and scope of public access to agency records. However, it does not limit discovery in a lawsuit to enforce that right. Instead, the Florida Civil Rules of Procedure define the scope of permitted discovery. Fla.R.Civ.P. 1.280 permits discovery on disputed facts. FDOC says it provided all of the data necessary to calculate the tentative release date. The ACLU disputes its completeness, integrity, and meaningfulness. These are factual disputes that will be at issue in the trial. The ACLU has a right to discover information about these disputes. An agency cannot simply say “trust us, we have no further records,” when the external facts and internal inconsistencies make clear that it is inaccurate. Chapter 119 cannot defeat reasonable discovery into an agency’s assurances. An agency cannot provide some public records and then refuse to answer questions that probe whether this is indeed true.

### Admission No. D17

Maybe by “concurrent” FDOC means something besides what everyone else means by concurrent? The ACLU wanted to know:

17. “Concurrent” in Field “P” (“concurrent or consecutive”) of the Offenses dataset (“OFNSOUT.txt”) signifies that the offense’s sentence runs concurrent with to the sentence of another offense.

Admission No. D17, *infra* at 36. FDOC refused to answer, citing its objections in Admission No. D15. *Id.* For the same reasons this objection is unwarranted before, it is unwarranted here.

### **D. Out of Custody Data (Bobbeth Morgan)**

The ACLU raised concerns about the integrity and completeness of the data provided about Bobbeth Morgan (FDOC No. I53158). ACLU’s Reply at 6. FDOC’s Root dataset (ROOTTOU.txt) shows she has an overall sentence term of 4½ years in prison and FDOC received her on Mar. 20, 2017.<sup>4</sup> Adding the sentence term to the reception date, FDOC should not incarcerate her after Sept.

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<sup>4</sup> The Offense dataset confirms a single 4½-year sentence, but also notes a July 25, 2018, sentence date with 13 days of jail credit. Using these figures, her release date should no later than Jan. 9, 2022.

17, 2021.<sup>5</sup> Yet, the Root dataset shows a release date of Aug. 9, 2022. The ACLU suspects Morgan was released/escaped from FDOC custody and returned to finish her sentence. However, FDOC did not provide any out-of-custody information.

#### Interrogatory No. D4

The ACLU propounded an interrogatory to resolve its data integrity and completeness concerns:

4. Why is Aug. 9, 2022, the provided tentative release date for the inmate with FDOC No. I53158, when she has an overall sentence of 4½ years and FDOC received her on Mar. 20, 2017—after all 4½ years after Mar. 20, 2017 is Sept. 2021?

Interrog. No. D4, *infra* at 30. FDOC refused to answer, citing its objections in Admission No. D15. *Id.* For the same reasons this objection is unwarranted before, it is unwarranted here.

#### Interrogatory No. D16

The ACLU focused its inquiry. FDOC denied it received Bobbeth Morgan (FDOC No. I53158) on Mar. 20, 2017. Admission No. D6. Yet, its webpage lists the Mar. 20, 2017, reception date. FDOC's Corrections Offender Network, FDOC

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<sup>5</sup> FDOC's real-time Corrections Offender Network similarly shows a Mar. 20, 2017, reception date and a single 4½-year sentence. It shows a July 30, 2022, release date presumably because she earned 10 days of gain time since FDOC's extraction. *See* <http://www.dc.state.fl.us/offenderSearch/detail.aspx?Page=Detail&DCNumber=I53158&TypeSearch=AI>

No. I53158, *infra* at 48.<sup>6</sup> So does the data FDOC provided. “3/20/2017” is listed in Field C (“Date FDOC assumed custody – admit date”)<sup>7</sup> for Ms. Morgan. Excerpt of ROOTTOU.txt, *infra* at 50. The ACLU wanted to get to the bottom of this obvious discrepancy and internal inconsistency. It asked:

16. When did FDOC received inmate with FDOC No. I53158? See Admission (denied), No. 6.

Interrogatory No. D16, *infra* at 36. FDOC refused to answer, citing its objections in Admission No. D15. *Id.* For the same reasons this objection is unwarranted before, it is unwarranted here.

### **E. Reasonable Attorney’s Fees**

If a moving party prevails on a motion to compel, absent exceptions the court “shall require the [opposing] party ... to pay to the moving party the reasonable expenses incurred in obtaining the order that may include attorneys’ fees.” Rule 1.380. No exception applies. The ACLU’s counsel conferred with FDOC’s counsel in a good faith attempt to resolve this dispute without court

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<sup>6</sup> Available at <http://www.dc.state.fl.us/offenderSearch/detail.aspx?Page=Detail&DCNumber=I53158&TypeSearch=AI>

<sup>7</sup> Along with the data produced on Jan. 14, 2020, FDOC provided Microsoft Word Document (ACLU DWNLD.docx) that specified the information within each field. Field C in the Root dataset is the “Date FDOC assumed custody – admit date” field. See ACLU DWNLD.docx, *infra* at 43.

action. FDOC’s refusal to provide discovery and opposition to this motion was not substantially justified. An award of expenses is just.

Benjamin Stevenson spent the following time on the following days preparing this motion to compel:

<b>Date</b>	<b>Hours</b>
2/19/2021	3.9
2/19/2021	0.2
2/22/2021	0.1
2/24/2021	1.3

Total: **5.5 hours**

U.S. District Court Judge Walker recently approved an hourly rate for Stevenson of \$525. *Prison Legal News v. Inch*, 4:12CV239-MW/CAS, 2019 WL 5394614, at \*3-4 (N.D. Fla. Oct. 22, 2019) (noting Stevenson’s request for \$525/hour and finding “Plaintiff’s proposed rates to be reasonable”).

**DECLARATION**

I performed the legal work identified above. This claimed time was necessarily incurred to complete this Motion to Compel. Some of my time was excluded as billing judgment. I have also excluded telephone conferences with co-counsel and co-counsel's time.

I have been a licensed attorney since 2002.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 24, 2021.

s/Benjamin Stevenson  
Benjamin Stevenson

WHEREFORE, the ACLU requests the following relief:

A. An order compelling FDOC to substantively respond to the following discovery: Interrogatory Nos. D1, D4, D5, & D16 and Request for Admissions Nos. D16-17.

B. Pursuant to Rule 1.380(a)(4), an order directing FDOC to pay the ACLU \$2,887.50 (5.5 hours x \$525/hour) for attorney's fees associated with this motion.

**CERTIFICATE OF CONFERRAL (RULE 1.380(A)(4))**

Plaintiff conferred with Defendant FDOC's counsel about this motion to compel in a good faith effort to obtain discovery without court action.

**CERTIFICATE OF SERVICE**

I certify that the foregoing document has been furnished to the following persons on the E-filed date of this document by filing the document with service through the e-Service system (Fla.R.Jud.Admin. 2.516(b)(1)):

**William D. Hall** (whall@deanmead.com, bgsanders@deanmead.com)  
**John L. Wharton** (jwharton@deanmead.com, hschack@deanmead.com)  
*Counsel for FDOC*

Respectfully Submitted,

s/Benjamin James Stevenson  
**Benjamin James Stevenson**  
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*Counsel for the Plaintiff*

IN THE FLORIDA SECOND JUDICIAL CIRCUIT  
IN AND FOR LEON COUNTY, FLORIDA

AMERICAN CIVIL LIBERTIES  
UNION OF FLORIDA, INC.,

Petitioner,

Case No.: 37 2019 CA 2747

v.

FLORIDA DEPARTMENT OF  
CORRECTIONS;

Respondent.

/

**ACLU'S FIRST COMPOSITE DISCOVERY REQUEST**

(Data)

To: **Will D. Hall**  
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215 S. Monroe Street, Suite 815,  
Tallahassee, FL 32301  
T. 850.264.0060  
WHall@deanmead.com  
*Counsel for FDOC*

Pursuant to the Florida Rules of Civil Procedure, American Civil Liberties Union, Inc., submits the following interrogatories and requests for admission and production:

**DEFINITIONS**

- A. "ACLU" means American Civil Liberties Union, Inc.
- B. "FDOC" means Florida Department of Corrections.
- C. "Tentative Release Date" means the same as the term is defined in § 944.275(3)(a), Fla. Stat.

D. “Ineligibility period” shall mean the portion or entity of an inmate’s sentence during which the inmate is ineligible for gain time. *See, e.g.*, § 784.07, Fla. Stat. (person ineligible for gain time while serving the minimum sentence for specified assault on LEO offenses); § 944.275(4)(e), Fla. Stat. (person ineligible for gain time while serving the entire portion of a sentence for kidnapping a young child).

E. “Dataset” means one of the datasets provided by FDOC to ACLU on Jan. 14, 2020, including the Root dataset (“Rootout.txt”), Gain Time dataset (“GNTMOUT.txt”), Offenses dataset (“OFNSOUT.txt”), Special Provision dataset (“SPCPOUT.txt.”).

## ADMISSIONS

Pursuant to Fla.R.Civ.P. 1.370, ACLU propounds the following request for admissions and requests that FDOC admit the truth of the facts set forth as follows:

1. The inmate with FDOC No. 082137 had gain time recorded during the first five years of his current incarceration.
2. The inmate with FDOC No. 082137 was ineligible (for purposes of accelerating his release date) to use any gain time recorded during the first five years of his current incarceration.
3. Each of the three current, 5-year sentences of the inmate with FDOC No. 082137 ran consecutive.
4. The inmate with FDOC No. 082137 had an overall term of 5,475 days or 15 years.
5. The inmate with FDOC No. I53158 was sentenced to 4½ years in prison for a single offense.
6. FDOC received inmate with FDOC No. I53158 on Mar. 20, 2017.
7. FDOC's uniform FDOC number is 6 characters in length.
8. The datasets exclude all persons (except a handful) with a tentative release date after Nov. 27, 2019, and before Dec. 19, 2019.
9. The datasets exclude persons received by FDOC after Nov. 27, 2019.
10. With the exception of fewer than 400 people, the datasets exclude all persons with a tentative release before Dec. 19, 2019.
11. Between Nov. 27, 2019, and Dec. 19, 2019, FDOC released on average over 50 persons per day.
12. Between Nov. 27, 2019, and Dec. 19, 2019, FDOC received into its custody on average over 50 persons per day.
13. FDOC does not include any inmates with a five-character FDOC Number in its quarterly published Offender Based Information System (OBIS) ([http://www.dc.state.fl.us/pub/obis\\_request.html](http://www.dc.state.fl.us/pub/obis_request.html)).
14. FDOC does not include any inmates with a five-character FDOC Number in its OBIS web page (<http://www.dc.state.fl.us/offendersearch/>).

## INTERROGATORIES

Pursuant to Fla.R.Civ.P. 1.340, ACLU requests that FDOC answer in writing and under oath the following interrogatories. When the interrogatory requests you to identify a person, then identify each person by name, mailing address, telephone number, and email address.

1. Identify by name the dataset(s) and field(s) that indicate an inmate's ineligibility period.

2. Do you contend that FDOC has no fields that specify an inmate's ineligibility period in terms of a unit of time? If not, was this field(s) provided and what is it called?

3. For purposes of calculating the tentative release date for the inmate with FDOC No. 082137, identify by name the dataset(s) and field(s) FDOC used to exclude the gain time earned by the during the first five years of his incarceration?

4. Why is Aug. 9, 2022, the provided tentative release date for the inmate with FDOC No. I53158, when she has an overall sentence of 4½ years and FDOC received her on Mar. 20, 2017—after all 4½ years after Mar. 20, 2017 is Sept. 2021?

5. Identify by name the dataset(s) and field(s) that indicate whether a sentence runs concurrent or consecutive with another sentence.

6. What data field(s) did FDOC use to determine that each sentence of the inmate with FDOC No. 082137 ran consecutive?

7. Was the inmate with FDOC No. 22975 in FDOC custody in December 2019? If so, where was he? If not, why did FDOC include him in the datasets.

8. Why are some FDOC Numbers 5 characters long, while most are 6 characters long?

9. On what date or date range did FDOC extract the datasets?

10. Identify the person(s) who extracted the datasets.

11. In the datasets, why does FDOC include as in its “current custody” over 300 people with tentative release dates before Oct. 24, 2019? Were those people not released on their tentative release date? What are the common reasons for this?

12. Is there a data dictionary that defines the terms in the provided Gain Time Reason for Status (“GTRSOUT.txt”) table? What is that data dictionary called?

13. What is the formula or computer code that FDOC uses to calculate the tentative release dates?

14. What dataset fields are necessary to calculate the tentative release dates?

## DOCUMENTS

1. All written material or instructions provided to the person who extracted the datasets.

**CERTIFICATE OF SERVICE**

I certify that the foregoing document has been furnished to the following person(s) on June 12, 2020, by email: **Will D. Hall** (WHall@deanmead.com) — Counsel for Def. FDOC.

Dated: June 12, 20220

**Respectfully Submitted,**

s/Benjamin James Stevenson  
**Benjamin James Stevenson**  
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*Counsel for ACLU*

IN THE CIRCUIT COURT OF THE SECOND JUDICIAL CIRCUIT,  
IN AND FOR LEON COUNTY, FLORIDA

AMERICAN CIVIL LIBERTIES UNION OF  
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CASE NO. 2019 CA 2747

FLORIDA DEPARTMENT OF CORRECTIONS,

Respondent.

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**RESPONDENT DEPARTMENT OF CORRECTIONS'  
RESPONSES TO ACLU'S FIRST COMPOSITE DISCOVERY REQUESTS  
(Data)**

Defendant FLORIDA DEPARTMENT OF CORRECTIONS ("Department"), by and through undersigned counsel, hereby responds to Plaintiff AMERICAN CIVIL LIBERTIES UNION, INC.'s, First Composite Discovery Requests. In response thereto, Defendant would answer as follows:

**ADMISSIONS**

1. The inmate with FDOC No. 082137 had gain time recorded during the first five years of his current incarceration.

Admit.

2. The inmate with FDOC No. 082137 was ineligible (for purposes of accelerating his release date) to use any gain time recorded during the first five years of his current incarceration.

Denied.

3. Each of the three current, 5-year sentences of the inmate with FDOC No. 082137 ran consecutive.

Admit.

4. The inmate with FDOC No. 082137 had an overall term of 5,475 days or 15 years.

Admit.

5. The inmate with FDOC No. I53158 was sentenced to 4½ years in prison for a single offense.

Admit.

6. FDOC received inmate with FDOC No. I53158 on Mar. 20, 2017.

Denied.

7. FDOC's uniform FDOC number is 6 characters in length.

Denied. The Department previously utilized 5-digit FDOC numbers. At some point, it switched to 6-digit numbers. Therefore, the Department currently has custody of inmates with 5 and 6-digit FDOC numbers.

8. The datasets exclude all persons (except a handful) with a tentative release date after Nov. 27, 2019, and before Dec. 19, 2019.

The Department objects to this request as vague to the extent the term "handful" is unclear and undefined. Notwithstanding that objection, denied. The datasets exclude all persons released before December 19, 2019.

9. The datasets exclude persons received by FDOC after Nov. 27, 2019.

Denied. The datasets exclude inmates that were received by the Department on and after December 1, 2019. There were no inmates received from November 28 to December 1, 2019.

10. With the exception of fewer than 400 people, the datasets exclude all persons with a tentative release before Dec. 19, 2019.

Denied. The datasets exclude all persons released before December 19, 2019. Any inmate with a listed tentative release date before December 19, 2019 who was included in the dataset had

not yet been released.

11. Between Nov. 27, 2019, and Dec. 19, 2019, FDOC released on average over 50 persons per day.

The Department objects to this request as irrelevant, not reasonably related to the discovery of admissible evidence, and beyond the scope of Chapter 119. This request has no bearing on anything in Chapter 119 or with the public records request at issue. To the extent the Plaintiff is asking the Department to “do the math” regarding any of the information provided, such a request is beyond the scope of Chapter 119. See Fla. A.G.O. 92-38; *In Re Report of the Sup. Ct. Workgroup on Public Records*, 825 So. 2d 889, 898 (Fla. 2002); § 119.01(1), F.S. (“It is the policy of this state that all state, county, and municipal *records* are open for personal inspection and copying by any person. Providing access to public *records* is a duty of each agency.”) (emphasis added).

12. Between Nov. 27, 2019, and Dec. 19, 2019, FDOC received into its custody on average over 50 persons per day.

The Department objects to this request as irrelevant, not reasonably related to the discovery of admissible evidence, and beyond the scope of Chapter 119. This request has no bearing on anything in Chapter 119 or with the public records request at issue. To the extent the Plaintiff is asking the Department to “do the math” regarding any of the information provided, such a request is beyond the scope of Chapter 119. See Fla. A.G.O. 92-38; *In Re Report of the Sup. Ct. Workgroup on Public Records*, 825 So. 2d 889, 898 (Fla. 2002); § 119.01(1), F.S. (“It is the policy of this state that all state, county, and municipal *records* are open for personal inspection and copying by any person. Providing access to public *records* is a duty of each agency.”) (emphasis added).

13. FDOC does not include any inmates with a five-character FDOC Number in its quarterly published Offender Based Information System (OBIS) ([http://www.dc.state.fl.us/pub/obis\\_request.html](http://www.dc.state.fl.us/pub/obis_request.html)).

Admit.

14. FDOC does not include any inmates with a five-character FDOC Number in its OBIS web page (<http://www.dc.state.fl.us/offendersearch/>).

Admit.

### **INTERROGATORIES**

1. **Identify by name the dataset(s) and field(s)** that indicate an inmate's ineligibility period.

**ANSWER:** From inmate case sentence structure screen: offense class code, offense date, class of felony code, offense qualifier code, sentencing guidelines category, special revision code, sentence chain type code, effective date of sentence, supersedeas bond days, time computation exception code.

From release date calculation screen: 85% minimum service requirement.

From miscellaneous offender data screen: sex offense history code, other ineligibility reason.

Entries of DR's and out time will also cause gain time ineligibility for a time.

2. Do you contend that FDOC has no fields that specify an inmate's ineligibility period in terms of a unit of time? If not, was this field(s) provided and what is it called?

**ANSWER:** There is not a single field that specifies this.

3. For purposes of calculating the tentative release date for the inmate with FDOC No. 082137, identify by name the dataset(s) and field(s) FDOC used to exclude the gain time earned by the during the first five years of his incarceration?

**ANSWER:** There was no gain time excluded during the first five years of his incarceration.

4. Why is Aug. 9, 2022, the provided tentative release date for the inmate with FDOC No. I53158, when she has an overall sentence of 4½ years and FDOC received her on Mar. 20, 2017—after all 4½ years after Mar. 20, 2017 is Sept. 2021?

**ANSWER:** The referenced information was provided in the manner in which it is kept at the Department. That is all that is required in Chapter 119. Any explanation or interpretation beyond that is outside the scope of Chapter 119. See Fla. A.G.O. 92-38; In Re Report of the Sup. Ct. Workgroup on Public Records, 825 So. 2d 889, 898 (Fla. 2002); § 119.01(1), F.S. (“It is the policy of this state that all state, county, and municipal records are open for personal inspection and copying by any person. Providing access to public records is a duty of each agency.”) (emphasis added).

5. Identify by name the dataset(s) and field(s) that indicate whether a sentence runs concurrent or consecutive with another sentence.

**ANSWER:** From inmate case sentence structure screen: sentence chain type code.

6. What data field(s) did FDOC use to determine that each sentence of the inmate with FDOC No. 082137 ran consecutive?

**ANSWER:** OFNSOUT.TXT file field P.

7. Was the inmate with FDOC No. 22975 in FDOC custody in December 2019? If so, where was he? If not, why did FDOC include him in the datasets.

**ANSWER:** The referenced information was provided in the manner in which it is kept at the Department. That is all that is required in Chapter 119. The inmate with FDOC No. 22975 is an escapee. Therefore, his sentence has not been satisfied.

8. Why are some FDOC Numbers 5 characters long, while most are 6 characters long?

**ANSWER:** Some inmates have 5-digit FDOC numbers and some inmates have 6-digit

FDOC numbers.

9. On what date or date range did FDOC extract the datasets?

**ANSWER:** December 19, 2019

10. Identify the person(s) who extracted the datasets.

**ANSWER:** Eldridge Edwards, Office of Information Technologies.

11. In the datasets, why does FDOC include as in its “current custody” over 300 people with tentative release dates before Oct. 24, 2019? Were those people not released on their tentative release date? What are the common reasons for this?

**ANSWER:** The referenced information was provided in the manner in which it is kept at the Department. That is all that is required in Chapter 119. Further, this information included escapees from Department custody as well as inmates who are currently being held at other facilities (county jails, etc.) while awaiting a court date on another charge or other proceeding.

12. Is there a data dictionary that defines the terms in the provided Gain Time Reason for Status (“GTRSOUT.txt”) table? What is that data dictionary called?

**ANSWER:** No.

13. What is the formula or computer code that FDOC uses to calculate the tentative release dates?

**ANSWER:** The Department objects to this request as overbroad, irrelevant, and not likely to lead to the discovery of admissible evidence in this case. This type of formula was not sought through the request at issue in this case. The Plaintiff has acknowledged this, going as far as to file a separate suit dealing with that matter on its own (see Leon County Circuit Case No. 2020 CA 854). The Department would refer the Plaintiff to its answers to the discovery promulgated in that case as well as its answer, response to the Plaintiff’s Motion for Summary Judgment, and other filings in that case.

14. What dataset fields are necessary to calculate the tentative release dates?

**ANSWER:** The Department objects to this request as vague, subjective, not reasonably related to the discovery of admissible evidence, and beyond the scope of Chapter 119. The method of calculating tentative release dates is not part of the request at issue in this case. The Plaintiff has acknowledged this, going as far as to file a separate suit dealing with that matter on its own (see Leon County Circuit Case No. 2020 CA 854). The Department would refer the Plaintiff to its answers to the discovery promulgated in that case as well as its answer, response to the Plaintiff's Motion for Summary Judgment, and other filings in that case.

15. What dataset fields are necessary to calculate the tentative release dates?

**ANSWER:** The Department objects to this request as vague, subjective, not reasonably related to the discovery of admissible evidence, and beyond the scope of Chapter 119. The method of calculating tentative release dates is not part of the request at issue in this case. The Plaintiff has acknowledged this, going as far as to file a separate suit dealing with that matter on its own (see Leon County Circuit Case No. 2020 CA 854). The Department would refer the Plaintiff to its answers to the discovery promulgated in that case as well as its answer, response to the Plaintiff's Motion for Summary Judgment, and other filings in that case.

### **DOCUMENTS**

1. All written material or instructions provided to the person who extracted the datasets.

**RESPONSE:** The only responsive document, the work order provided to Mr. Edwards, has been provided contemporaneously with this response.

Respectfully submitted this 17th day of July, 2020

s/William D. Hall, III

WILLIAM D. HALL III (FBN 67936)

JOHN L. WHARTON (FBN 563099)

Dean Mead and Dunbar

215 South Monroe Street, Suite 815

Tallahassee, Florida 32301

Telephone: 850-999-4100

E-Mail: whall@deanmead.com

VERIFICATION

I declare and affirm under penalty of perjury that the foregoing interrogatory answers are true, correct, and complete.

Michelle Palmer  
**Name:** Michelle Palmer  
**Title:** Chief, Bureau of Admission & Release

7/20/20  
**Date**

STATE OF FLORIDA  
COUNTY OF ESCAMBIA

Sworn to (or affirmed) and subscribed before me on July 20, 2020, by ✓ who is personally known to me or has produced the following identification: Driver's License.

Stacey Hackney  
Signature

Notary  
Stamp:



**STACEY HACKNEY**  
MY COMMISSION # GG 003956  
EXPIRES: October 20, 2020  
Bonded Thru Budget Notary Services

Executed on July 20, 2020.

\_\_\_\_\_  
(signature)

Printed Name: \_\_\_\_\_

IN THE CIRCUIT COURT OF THE SECOND JUDICIAL CIRCUIT,  
IN AND FOR LEON COUNTY, FLORIDA

AMERICAN CIVIL LIBERTIES  
UNION OF FLORIDA, INC.,

Petitioner,

v.

CASE NO. 2019 CA 2747

FLORIDA DEPARTMENT OF  
CORRECTIONS,

Respondent.

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**RESPONDENT DEPARTMENT OF CORRECTIONS'**  
**RESPONSES TO ACLU'S SECOND COMPOSITE DISCOVERY REQUESTS**

Respondent, FLORIDA DEPARTMENT OF CORRECTIONS (“FDOC”), by and through undersigned counsel, hereby responds to Petitioner, AMERICAN CIVIL LIBERTIES UNION, INC.’s, Second Composite Discovery Requests. In response thereto, Respondent would answer as follows:

**ADMISSIONS**

Pursuant to Fla.R.Civ.P. 1.370, ACLU propounds the following request for admissions and requests that FDOC admit the truth of the facts set forth as follows:

15. Columns (a) – (f) of the attached “082137 Extract” accurately reflects all of the data provided in the Gain Time dataset (“GNTMOUT.txt”) related to inmate with FDOC No. 082137.

\_\_\_\_\_ Admit

\_\_\_\_\_ Deny

**ANSWER:** Objection. This request is overbroad, vague, burdensome, and is not reasonably calculated to lead to the discovery of admissible evidence and is beyond the scope of Chapter 119. This request has no bearing on, or is inconsistent with, anything Chapter 119 requires to be produced or to the public records request at issue.

Unless exempt or confidential, the requested information must be provided in the manner



Respectfully submitted this 9<sup>th</sup> day of November, 2020.

/s/ John L. Wharton  
JOHN L. WHARTON  
Florida Bar No. 563099  
WILLIAM D. HALL III  
Florida Bar No. 67936  
Dean Mead and Dunbar  
215 South Monroe Street, Suite 815  
Tallahassee, Florida 32301  
Telephone: 850.425.7800  
Facsimile: 850-577-0095

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that the foregoing document has been furnished this 9<sup>th</sup> day of November 2020, via electronic mail through the Florida E-Filing Portal to the following:

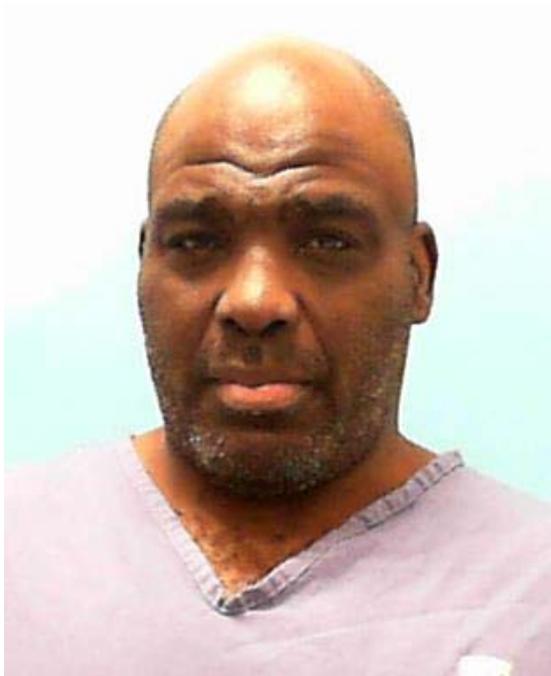
Benjamin James Stevenson  
ACLU Foundation of Florida  
3 W. Garden St., Suite 712  
Pensacola, FL 32502-5636  
T. 786.363.2738  
bstevenson@aclufl.org

*Counsel for the Petitioner*

Daniel Tilley  
ACLU Foundation of Florida  
4343 W. Flagler St., Suite 400  
Miami, FL 33134  
T. 786.363.2714  
dtilley@aclufl.org

*Counsel for the Petitioner*

/s/ John L. Wharton



**DC Number:** 082137

**Name:** HALL, TROY B

**Race:** BLACK

**Sex:** MALE

**Birth Date:** 03/22/1965

**Initial Receipt Date:** 01/24/2012

**Current Facility:** FLORIDA STATE PRISON (<http://prod.fdc-wpws001.fdc.myflorida.com/org/facilitydir.html#X205>)

**Current Custody:** CLOSE

**Current Release Date:** 12/08/2025



(<https://www.vinelink.com/vinelink/servlet/SubjectSearch?siteID=10000&agency=900&offenderID=082137>)

(Release Date subject to change pending gain time award, gain time forfeiture, or review. A "TO BE SET" Release Date is to be established pending review.)

[Visiting Request Form - Part 1 \(http://prod.fdc-wpws001.fdc.myflorida.com/ci/visit/205.pdf\)](http://prod.fdc-wpws001.fdc.myflorida.com/ci/visit/205.pdf)

[Visiting Request Form - Part 2 \(http://prod.fdc-wpws001.fdc.myflorida.com/ci/visit/DC6-111B.pdf\)](http://prod.fdc-wpws001.fdc.myflorida.com/ci/visit/DC6-111B.pdf)

[How to Apply for Visitation \(http://prod.fdc-wpws001.fdc.myflorida.com/ci/visit.html\)](http://prod.fdc-wpws001.fdc.myflorida.com/ci/visit.html)

## Aliases:

BLOOD, YOUNGBLOOD, TRAY HALL, TROY HALL, TROY B HALL, TROY BERNARD HALL, TROY D HALL, TROY D. HALL, TROY DENARD HALL, TROY DENNARD HALL, TROY SANDERS

### Current Prison Sentence History:

Offense Date	Offense	Sentence Date	County	Case No.	Prison Sentence Length
08/28/2010	RESISTING OFFICER W/VIOLEN.	08/24/2011	PINELLAS	1018965	5Y 0M 0D
08/28/2010	BATT.LEO/FIRFGT/EMS/ETC.	08/24/2011	PINELLAS	1018965	5Y 0M 0D
08/28/2010	BATT.LEO/FIRFGT/EMS/ETC.	08/24/2011	PINELLAS	1018965	5Y 0M 0D

Note: The offense descriptions are truncated and do not necessarily reflect the crime of conviction. Please refer to the court documents or the Florida Statutes for further information or definition.

**Detainers:** (Further information may be obtained by contacting the detaining agency)

Detainer Date	Agency	Type	Date Canceled
03/17/2004	NOTIFY 082 STARKE	NTFY/P&P	05/24/2004

### Incarceration History:

Date In-Custody	Date Out-Custody
02/19/1982	08/02/1983
12/11/1985	03/17/1986
02/11/1988	08/30/1991
02/02/1993	05/24/2004
01/24/2012	Currently Incarcerated

**Prior Prison History:** (Note: Data reflected covers periods of incarceration with the Florida Dept.of Corrections since January of 1983)

Offense Date	Offense	Sentence Date	County	Case No.	Prison Sentence Length
06/30/1981	BURG/DWELL/OCCUP.CONVEY	02/11/1982	PINELLAS		2Y 0M 0D
06/30/1981	BURG/DWELL/OCCUP.CONVEY	11/07/1985	PINELLAS	8106162	2Y 6M 0D
10/31/1986	ARSON WILLFUL DAMA.DWELLING	01/29/1988	PINELLAS	8614314	10Y 0M 0D
09/14/1987	COCAINE-POSSESS	01/29/1988	PINELLAS	8801121	5Y 0M 0D
10/09/1987	BATT.LEO/FIRFGT/EMS/ETC.	01/29/1988	PINELLAS	8712181	5Y 0M 0D
10/08/1987	SALE OF COUNTERFEIT DRUGS	01/29/1988	PINELLAS	8712076	5Y 0M 0D
05/13/1987	COCAINE-POSSESS	01/29/1988	PINELLAS	8711099	5Y 0M 0D
05/13/1987	COCAINE-POSSESS	01/29/1988	PINELLAS	8708671	5Y 0M 0D
05/16/1986	COCAINE-SALE OR PURCHASE	01/29/1988	PINELLAS	8609290	5Y 0M 0D
05/16/1986	COCAINE-POSSESS	01/29/1988	PINELLAS	8609290	5Y 0M 0D
10/21/1986	COCAINE-SALE OR PURCHASE	01/29/1988	PINELLAS	8613755	5Y 0M 0D
10/21/1986	COCAINE-POSSESS	01/29/1988	PINELLAS	8613755	5Y 0M 0D
07/01/1986	ROBB. NO GUN/DDLY.WPN	01/29/1988	PINELLAS	8608252	5Y 0M 0D
07/01/1986	RESISTING OFFICER W/VIOLEN.	01/29/1988	PINELLAS	8608252	5Y 0M 0D
11/20/1991	AGG BATTERY INTENDED HARM	01/20/1993	PINELLAS	9119178	2Y 0M 0D
11/22/1991	BATT.LEO/FIRFGT/EMS/ETC.	01/20/1993	PINELLAS	9119178	5Y 0M 0D
11/22/1991	RESISTING OFFICER W/VIOLEN.	01/20/1993	PINELLAS	9119178	5Y 0M 0D

**About Us**

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**Quick Links**

<http://www.dc.state.fl.us>

**Contact Us**

(<http://www.dc.state.fl.us/org/contact.html>)

Contact an Inmate (<http://www.dc.state.fl.us/ci/ContactInmate.html>)

Victim Services (<http://www.dc.state.fl.us/vict/index.html>)

*As Florida's largest state agency, and the third largest*

<http://www.dc.state.fl.us>

Inmate and Offender Programs (<http://www.dc.state.fl.us/development>)

501 South Calhoun Street  
Tallahassee, FL 32399-2500

prison system in the country,

<i>FDC employs 24,000 members. incarcerates approximately 96,000 inmates and supervises nearly 166,000 offenders in the community.</i>	CONSTRUCTIVE POSSESSION Volunteer <a href="http://www.dc.state.fl.us">http://www.dc.state.fl.us</a>	01/20/1993	PINELLAS Corrections Foundation	9214375	Main: (850) 488-5021 5Y OM OD
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<a href="/comm/PRR.html">/comm/PRR.html</a>	<a href="/index.html">/index.html</a>	<a href="https://www.correctionsfoundation.org/">(https://www.correctionsfoundation.org/)</a>	<a href="http://www.dc.state.fl.us">http://www.dc.state.fl.us</a>	<a href="http://www.fcor.state.fl.us">http://www.fcor.state.fl.us</a>	<a href="http://www.dc.state.fl.us/citizen">http://www.dc.state.fl.us/citizen</a>
<a href="http://www.dc.state.fl.us">http://www.dc.state.fl.us</a>	<a href="https://www.correctionsfoundation.org/">(https://www.correctionsfoundation.org/)</a>	<a href="https://www.fcor.state.fl.us">https://www.fcor.state.fl.us</a>	<a href="https://www.fcor.state.fl.us">https://www.fcor.state.fl.us</a>	<a href="https://www.fcor.state.fl.us">https://www.fcor.state.fl.us</a>	<a href="https://www.fcor.state.fl.us">https://www.fcor.state.fl.us</a>
<a href="/volunteer/index.html">/volunteer/index.html</a>	<a href="https://www.correctionsfoundation.org/">(https://www.correctionsfoundation.org/)</a>	<a href="https://www.fcor.state.fl.us">https://www.fcor.state.fl.us</a>	<a href="https://www.fcor.state.fl.us">https://www.fcor.state.fl.us</a>	<a href="https://www.fcor.state.fl.us">https://www.fcor.state.fl.us</a>	<a href="https://www.fcor.state.fl.us">https://www.fcor.state.fl.us</a>
<a href="http://www.dc.state.fl.us">http://www.dc.state.fl.us</a>	<a href="https://www.fcor.state.fl.us">https://www.fcor.state.fl.us</a>	<a href="https://www.fcor.state.fl.us">https://www.fcor.state.fl.us</a>	<a href="https://www.fcor.state.fl.us">https://www.fcor.state.fl.us</a>	<a href="https://www.fcor.state.fl.us">https://www.fcor.state.fl.us</a>	<a href="https://www.fcor.state.fl.us">https://www.fcor.state.fl.us</a>
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<a href="#">First</a>	<a href="#">Previous</a>	<a href="#">Next</a>	<a href="#">Last</a>	<a href="#">Organization</a>	<a href="#">Inspector General</a>
<a href="#">Return to List</a>	<a href="#">Regulatory Plan</a>	<a href="#">Prison Rape Elimination Act</a>	<a href="#">PCEA Index.html</a>	<a href="#">Record: For I</a>	<a href="#">/index.html</a>

The Florida Department of Corrections updates this information regularly, to ensure that it is complete and accurate, however this information can change quickly.

Therefore, the information on this site may not reflect the true current location, status, release date, or other information regarding an inmate.

This database contains public record information on felony offenders sentenced to the Department of Corrections. This information only includes offenders sentenced to state prison or state supervision. Information contained herein includes current and prior offenses. Offense types include related crimes such as attempts, conspiracies and solicitations to commit crimes. Information on offenders sentenced to county jail, county probation, or any other form of supervision is not contained. The information is derived from court records provided to the Department of Corrections and is made available as a public service to interested citizens. The Department of Corrections makes no guarantee as to the accuracy or completeness of the information contained herein. Any person who believes information provided is not accurate may contact the Department of Corrections.

For questions and comments, you may contact the Department of Corrections, Bureau of Classification and Central Records, at (850) 488-9859 or go to [Frequently Asked Questions About Inmates](#) for more information ( <http://prod.fdc-wpws001.fdc.myflorida.com/ci/index.html> ). This information is made available to the public and law enforcement in the interest of public safety.

Search Criteria: ([/OffenderSearch/search.aspx?TypeSearch=AI](#)). DC#: 082137 Search Aliases: NO Offense Category: County of Commitment: ALL Current Location: ALL

[Return to Corrections Offender Information Network \(../OffenderSearch/InmateInfoMenu.aspx\)](#)

There are 4 main files (numbers 1-4). The files can be tied together thru the DC number. The Special provision file can be tied to the Offense file by use of the DC number, prefix and component. There is 1 Root file per inmate but each inmate can have one or more Offense, Special provision or Gain time records. The yellow highlighted items relate to the request sent by the ACLU. All fields are separated by a '|' symbol.

- 1) Root file: 50 byte record length            ROOTOUT.TXT
  - a) DC number (1)
  - b) Race code (2)
  - c) Date FDOC assumed custody – admit date (4) (CCYY-MM-DD)
  - d) Tentative Release Date (5) and (6h) (CCYY-MM-DD or text for life, death or to be set)
  - e) Provisional Release Date (6d) (CCYY-MM-DD or text for life, death or to be set)
  - f) overall term – in days (6a)
  
- 2) Offense file: 125 byte record length            OFNSOUT.TXT
  - a) DC number
  - b) Prefix
  - c) component
  - d) Offense date (3a) (CCYY-MM-DD)
  - e) Date Adjudicated – We will send the date imposed (3b) (CCYY-MM-DD)
  - f) County of offense (3c)
  - g) Case number (3d)
  - h) Prison term – This is (3e) and (7a) (XXXYXXMXXD)
  - i) Adjudication Charge Description – Offense code (3f)
  - j) qualifier description – will send the code (3g)
  - k) Adjudication Description – will send adjudication withheld (3h)
  - l) Adjudication Charge's Florida Statute Subsection (3i)
  - m) Sentencing Guidelines Offense Level (6b)
  - n) 85% minimum release date (6c) (CCYY-MM-DD)
  - o) Sentence date – will send effective date (6f) (CCYY-MM-DD)
  - p) concurrent or consecutive (7b)
  - q) jail credits (7c)
  
- 3) Special provision file: 20 byte record length            SPCPOUT.TXT
  - a) DC number
  - b) Prefix
  - c) Component
  - d) special provision code (6e)
  
- 4) Gain time file: 25 byte record length            GNTMOUT.TXT
  - a) DC number
  - b) gain time year and month awarded (CCYY-MM)
  - c) gain time type (7e)
  - d) gain time days (7e)
  - e) gain time status (7e)
  - f) gain time reason for status (7f)

The codes tables are all 40 bytes long and the numbers at the end correspond to the file and row number they are for. So the race code is in file 1b above.

5) Code tables:

a) race table	40 byte record length, code for (1b)	RACEOUT.TXT
b) County of offense table	40 byte record length, code for (2f)	CNTYOUT.TXT
c) Offense code table	40 byte record length, code for (2i)	OFFNOUT.TXT
d) Qualifier table	40 byte record length, code for (2j)	QUALOUT.TXT
e) Adjudication table	40 byte record length, code for (2k)	ADJUOUT.TXT
f) CC or CS table	40 byte record length, code for (2p)	CHANOUT.TXT
g) special provision table	40 byte record length, code for (3d)	SPCDOUT.TXT
h) gain time type table	40 byte record length, code for (4c)	GTTPOUT.TXT
i) gain time status table	40 byte record length, code for (4e)	GTSTOUT.TXT
j) gain time reason table	40 byte record length, code for (4f)	GTRSOUT.TXT

The following is the number of records on each file

- 1) 95,045
- 2) 380,840
- 3) 553,251
- 4) 8,678,308
- 5a) 8
- 5b) 71
- 5c) 2,246
- 5d) 9
- 5e) 3
- 5f) 4
- 5g) 67
- 5h) 24
- 5i) 14
- 5j) 41

## Excerpt of OFNSOUT.txt

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q
1	082137	D	1	8/28/2010	8/24/2011	52	1018965	005Y00M00D	4801	6	N	843.01	5	5/1/2015	8/24/2011	CC	205
2	082137	D	2	8/28/2010	8/24/2011	52	1018965	005Y00M00D	1321	6	N	784.07	4	4/21/2020	8/24/2011	CC	0
3	082137	D	3	8/28/2010	8/24/2011	52	1018965	005Y00M00D	1321	6	N	784.07	4	2/23/2025	8/24/2011	CC	0

	A	B
1	CC	CONCURRENT
2	CS	CONSECUTIVE
3	CT	COTERMINOUS
4	IN	INITIAL

D.C. No.:  
 COMMIT. PREFIX:  
 SOC. SEC. No.:  
 RACE / SEX:  
 D.O.B.:  
 FDLE-No.:  
 F.B.I. No.:  
 ADM. DATE:

CMP.      OBTS #

**FLORIDA DEPARTMENT OF CORRECTIONS  
 PRISON COMMITMENT CODE SHEET**

Page \_\_\_\_\_ of \_\_\_\_\_

OFFENDER \_\_\_\_\_ SUFFIX \_\_\_\_\_  
 (Committed Last Name) (First) (Middle Name)  
 COURT \_\_\_\_\_ Judge \_\_\_\_\_  
 Code County Arr. Agency

COURT CASE/OFFENDER INFORMATION													SENTENCE STRUCTURE												
#1	VICTIM INFO INCLUDED	COMPONENT	CASE NO.(S)	ADJ. WITHHELD	TYPE OF DISPOSITION	CONVICTED OF VIOLATION OF FS SECTION	OFFENSE(S) OF CONVICTION			TYPE OF SENTENCE			LENGTH OF SENTENCE				SPECIAL PROVISIONS				CONCURRENT/ CONSECUTIVE FLAGS. ENTER FLAG FROM	DATE SENTENCE IMPOSED	EFFECTIVE SENTENCE DATE	SUPERSEDEAS BOND DAYS	
							#2	#3	#4	#5	#6	MINIMUM	COUNTY JAIL TIME CREDIT (CJT)	MAXIMUM	TERM OF SUPERVISION	#7	* TOTAL MINIMUM MANDATORY	#8							
																		CS/CC	PFX.	CMP.					
			99999			Chap. Sec. Para.	9999	MM DD YY				EXAMPLE 001 06 00 or 000 06 00	EG 1044 or 0300	EXAMPLE 18 months 001 06 00 or 18 Months 90 days 001 06 90	EXAMPLE 1 year 6 months 001 06 00	* Term of years must be entered for each special provision which requires mandatory term.	EXAMPLE 015 00 00 or 003 00 00								

- LIST #1**  
 Y INCLUDED  
 N NOT INCLUDED  
 I INAPPLICABLE
- LIST #2**  
 GP GUILTY PLEA  
 NC NOLO CONTENDRE  
 PV SUPV. VIOLATOR  
 UN UNKNOWN
- LIST #3**  
 1 CONSPIRACY TO ATTEMPT CRIMINAL ACT  
 2 CONSPIRACY TO COMMIT CRIMINAL ACT  
 3 ACCESSORY TO ATTEMPTED CRIMINAL ACT  
 4 ACCESSORY TO CRIMINAL ACT  
 5 PRINCIPAL IN ATTEMPTED CRIMINAL ACT  
 6 PRINCIPAL IN CRIMINAL ACT  
 7 SOLICITATION IN ATTEMPTED CRIMINAL ACT  
 8 SOLICITATION IN CRIMINAL ACT  
 9 UNKNOWN
- LIST #4**  
 C CAPITAL  
 L LIFE  
 P 1ST DEGREE PBL  
 1 1ST DEGREE  
 2 2ND DEGREE  
 3 3RD DEGREE  
 4 FELONY REDUCED TO MISDEMEANOR  
 5 MISDEMEANOR  
 9 UNKNOWN
- LIST #5**  
 SP STATE PRISON  
 PR PROBATION  
 CC COMMUNITY CONTROL  
 PP PRISON AS CONDITION OF PROBATION  
 IC INTERSTATE COMPACT
- LIST #6**  
 GA/TA TIME SERVED  
 GB/TB TIME SERVED AND UNFORFEITED GAIN-TIME  
 GC/TC TERM  
 GD/TD SPECIFIED # OF DAYS  
 GE/TE PRISON CREDIT  
 GF/TF CREDIT FOR TIME FROM COMP. NEVER SERVED  
 GG VOP CREDIT ONLY  
 GH VOP AND ORIG. CJT
- LIST #7**  
 YO YOUTHFUL OFFENDER ACT (958.05)  
 PI PAROLE INELIGIBLE  
 FA CRIME COMMITTED WITH FIREARM (775.087(2))  
 DT DRUG TRAFFICKING (893.135)  
 SD SCHOOL DRUG (893.13(1)(E)(1))  
 HO HABITUAL OFFENDER (775.084)
- LIST #8**  
 HV HABITUAL VIOLENT OFFENDER (775.084(5)(B))  
 LE CRIMES AGAINST LAW ENFORCEMENT (775.0823)  
 SW SPECIAL WEAPON (790.221)  
 GB BATTERY AGAINST THE ELDERLY (784.08)  
 OM OTHER MANDATORY TERM  
 JR JURISDICTION RETAINED [947.18(3)]  
 MD MENTALLY DISORDERED SEX OFFENDER  
 NE NOT ELIGIBLE TO EARN GAIN TIME  
 PF DRUG W/IN 200 FT. PUB. FAC. [893.1(1)(1)]  
 AM ATTEMPTED MURDER LEO (775.0825)  
 CE CONTIN. CRIMINAL ENTERPRISE (893.10)  
 DD MAKE/POSS/THROW/DEST. DEVICE (790.161)  
 DP DRUG PUNISHMENT ACT [948.06(6)]  
 HB HOAX BOMB (790.165)  
 LF TAKE/POSS/USE LEO'S FIREARM (775.0875)  
 SX CT. DESIGNATED SEXUAL PREDATOR

CODED BY: \_\_\_\_\_ NAME \_\_\_\_\_ DATE \_\_\_\_\_  
 ENTERED BY: \_\_\_\_\_ NAME \_\_\_\_\_ DATE \_\_\_\_\_  
 AUDITED BY: \_\_\_\_\_ NAME \_\_\_\_\_ DATE \_\_\_\_\_

DC4-310(2/94)



**DC Number:** I53158  
**Name:** MORGAN, BOBBETH  
**Race:** BLACK  
**Sex:** FEMALE  
**Birth Date:** 04/17/1978

**Initial Receipt Date:** 03/20/2017

**Current Facility:** [LOWELL ANNEX \(http://prod.fdc-wpws001.fdc.myflorida.com/org/facilitydir.html#X367\)](http://prod.fdc-wpws001.fdc.myflorida.com/org/facilitydir.html#X367)

**Current Custody:** CLOSE

**Current Release Date:** 05/09/2022



**(<https://www.vinelink.com/vinelink/servlet/SubjectSearch?siteID=10000&agency=900&offenderID=I53158>)**

(Release Date subject to change pending gain time award, gain time forfeiture, or review. A 'TO BE SET' Release Date is to be established pending review.)

[Visiting Request Form - Part 1 \(http://prod.fdc-wpws001.fdc.myflorida.com/ci/visit/367.pdf\)](http://prod.fdc-wpws001.fdc.myflorida.com/ci/visit/367.pdf)

[Visiting Request Form - Part 2 \(http://prod.fdc-wpws001.fdc.myflorida.com/ci/visit/DC6-111B.pdf\)](http://prod.fdc-wpws001.fdc.myflorida.com/ci/visit/DC6-111B.pdf)

[How to Apply for Visitation \(http://prod.fdc-wpws001.fdc.myflorida.com/ci/visit.html\)](http://prod.fdc-wpws001.fdc.myflorida.com/ci/visit.html)

**Aliases:**

BOBBETH MORGAN, BOBBETH ORINTHA MORGAN, BOBBETH OTINTHIA MORGAN

**Current Prison Sentence History:**

Offense Date	Offense	Sentence Date	County	Case No.	Prison Sentence Length
09/06/2015	AGG BATTERY INTENDED HARM	07/25/2018	BROWARD	1511899	4Y 6M 0D

Note: The offense descriptions are truncated and do not necessarily reflect the crime of conviction. Please refer to the court documents or the Florida Statutes for further information or definition.

**Detainers:**(Further information may be obtained by contacting the detaining agency)

Detainer Date	Agency	Type	Date Canceled
07/25/2018	17B 1511899 54 MTHS	NTFY/P&P	

**Incarceration History:**

Date In-Custody	Date Out-Custody
03/20/2017	Currently Incarcerated

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Record: 1 of 1

The Florida Department of Corrections updates this information regularly, to ensure that it is complete and accurate, however this information can change quickly. Therefore, the information on this site may not reflect the true current location, status, release date, or other information regarding an inmate. This database contains public record information on felony offenders sentenced to the Department of Corrections. This information only includes offenders sentenced to state prison or state supervision. Information contained herein includes current and prior offenses. Offense types include related crimes such as attempts, conspiracies and solicitations to commit crimes. Information on offenders sentenced to county jail, county probation, or any other form of

Except of ROOTOUT.txt

	A	B	C	D	E	F
1	I53158	2	3/20/2017	8/9/2022	8/9/2022	1643