

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	No. 05 CR 727-1
)	
CONRAD M. BLACK)	Hon. Amy J. St. Eve

**SUPPLEMENTAL EXHIBITS TO
GOVERNMENT'S SENTENCING MEMORANDA**

The government submits the attached declarations from Coleman FCI - Low staff in response to assertions in defendant's sentencing submissions concerning his work as a tutor and the circumstances of his incarceration at Coleman. The government provides these declarations not to discount the work that defendant or other inmate tutors have performed in prisons like Coleman; as the government previously stated, such work is laudable. The purpose of the declarations, instead, is to present the Court with accurate information concerning the scope of the defendant's activities, in light of the characterizations in his sentencing memoranda. See, e.g., Def.'s Br. 8-10, 16-18; Def.'s Resp. 29.

Dated: June 2, 2011

Respectfully submitted,
PATRICK J. FITZGERALD
United States Attorney

By: s/ Julie B. Porter
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CERTIFICATE OF SERVICE

The undersigned Assistant United States Attorney hereby certifies that the following document:

Supplemental Exhibits to Government's Sentencing Memoranda

was served on June 2, 2011, in accordance with FED. R. CRIM. P. 49, FED. R. CIV. P. 5, LR 5.5, and the General Order on Electronic Case Filing (ECF) pursuant to the district court's system as to ECF filers.

s/ Julie B. Porter

JULIE B. PORTER

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STATE OF FLORIDA)
)
COUNTY OF SUMTER)

DECLARATION

I, Carrie DeLaGarza, state under penalty of perjury, pursuant to 28 U.S.C. § 1746:

1. I am an Education Specialist at Coleman FCI - Low in Coleman, Florida. I have worked at Coleman since July 2001, teaching a GED class and coordinating Coleman's literacy program.
2. Coleman has had a GED program since it opened in 1995. My understanding is that Congress mandates 240 hours of instruction for any inmate who does not already have a GED or high school diploma. At Coleman, incoming inmates without degrees are tested and placed in GED classes. Inmates enrolled in GED classes typically attend class one-and-a-half hours per day, five days a week. Currently, there are approximately 280 inmates at Coleman Low enrolled in GED classes.
3. GED classes are led by civil-servant teachers, like me. In addition, Coleman typically uses inmate tutors to assist in the program. Tutors assist in various topics, such as math, writing, social studies, and science. Coleman has used tutors in the GED program for the entire time I have been working here.
4. I met Conrad Black while he was an inmate at Coleman. Black worked as a GED tutor from March 31, 2008 to July 21, 2010. He was a tutor for three Advanced GED-level classes and one Pre-GED level class in the Vocational Training Department. He worked with students on grammar and writing skills only. During this time frame, 117 students from these four classes obtained their GED. To the best of my memory and records, from those 117 GED completions, 18 students were tutored by Black. Normally, Black tutored one student per class

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time. Occasionally, there may have been two to three students receiving writing tutoring at a time, but this was not the norm. Often times there were no students needing writing tutoring.

5. For Coleman FCI - Low, including all GED classes, both English and Spanish, the following numbers of inmates received degrees: 87 inmates in 2007, 76 inmates in 2008, 74 inmates in 2009, and 81 inmates in 2010. There has been no increase in the graduation rate of Coleman's GED students; to the contrary, there has been a decline. To my knowledge, Coleman FCI - Low has received no additional funding for its GED classes.

6. Black was one of three tutors assigned to my class. He did perform tutoring, as he was assigned to do. I would not say, however, that Black went above and beyond what was expected of him in his job or impacted the program any differently than other tutors. On days Black was assigned to work as a tutor, he was supposed to arrive at 7:30 a.m. He was frequently late. Black often sat outside the classroom in the back of the department, reading newspapers, reading novels, and writing what appeared to be a book. In addition, Black elected to take a piano class, which caused him to miss parts of the GED classes. Of the three tutors assigned to my class during the time that Black was an inmate at Coleman, Black put in the fewest hours.

7. Based on my interactions with Black, he projected the attitude that he was better

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than others in the class, both faculty and students. A lot of the inmates looked up to him, and there were some who saluted him each day in class.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 2, 2011.


Carrie DeLaGarza

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STATE OF FLORIDA)
)
COUNTY OF SUMTER)

DECLARATION

I, Tammy Padgett, state under penalty of perjury, pursuant to 28 U.S.C. § 1746:

1. I am a Unit Manager at Coleman FCI - Low in Coleman, Florida. I have been working in corrections since 1992, and have worked in the federal system since 2001. As a Unit Manager, my job is to supervise Case Managers, who work one-on-one with inmates, and to address issues and problems that arise in the Unit I manage.

2. Coleman has established policies for all inmates governing calls to attorneys. Counselors place the calls for each inmate, after receiving a letter from the inmate's attorney on the attorney's letterhead via U.S. mail. Black initially demanded special treatment, expecting counselors to prioritize his requests over those of other inmates.

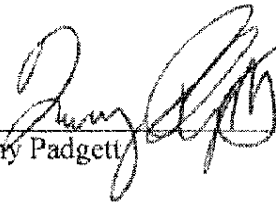
3. During the time that Black was at Coleman, I observed that he gathered a following of inmates who performed services for him, acting like servants. These inmates cooked for Black, cleaned for him, mopped his floor, ironed his clothes, and other similar tasks. This is not at all frequent at Coleman.

4. Black's assigned Case Manager at Coleman was Ms. Carbone. I directly supervise Ms. Carbone. Ms. Carbone reported to me that she met with Black in 2010, the day before he was to be released on bond. Black told Ms. Carbone words to the effect of, "I believe I should be addressed as Lord Black from this point forward." Ms. Carbone informed Black that she would

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address him as she addressed other inmates.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 2, 2011.



Tammy Padgett