



# Sacramento County District Attorney's Office

ANNE MARIE SCHUBERT  
District Attorney

Stephen J. Grippi  
Chief Deputy

Michael A. Neves  
Assistant District Attorney

September 2, 2015

Non-Violent Second Striker Board of Parole Hearings  
Correspondence-NVSS  
Post Box 4036  
Sacramento, CA 95812-4036

RE: Justice Alleyne CDCR# T96407

[REDACTED]

[REDACTED] In 2001 he was arrested in Butte County for residential burglary and making criminal threats. In that case he was involved in an argument with his wife so his wife took their 1 year-old daughter to a friend's house. Mr. Alleyne showed up angry and threatened to kill his wife who escaped by jumping out a back window. Mr. Alleyne then kicked in the door, took his daughter and threatened to return and kill everyone there. He was convicted of residential burglary and making criminal threats, both strike offenses, in 2003. On the same date, he was convicted in a separate case of felony evading pursuant to Vehicle Code section 2800.2.

[REDACTED]

In 2002, he was driving a vehicle erratically and was stopped by the police. A search of that vehicle revealed a handgun and a box of ammunition in the trunk. Charges were ultimately dismissed.

According to his Sacramento County Probation report, Mr. Alleyne admitted to being a member of the "Crips" criminal street gang. He made this admission on June 12, 2002 while at the Shasta County Jail.

The case for which Mr. Alleyne is currently incarcerated is for transporting nearly a pound of Cocaine Base from Minnesota to Sacramento County for the purpose of selling and/or distributing it. When police attempted to contact Mr. Alleyne on the bus that he was on, he hid in the bathroom and did not surrender until the police deployed a K-9 onto the bus to apprehend him. He was traveling under assumed names but when contacted he was in possession of nearly \$1,200 in cash, a scale and other miscellaneous items.

At the time he was convicted for his current commitment offense, Mr. Alleyne had an active warrant in Butte County for a violation of Penal Code section 245 and an allegation that he personally inflicted great bodily injury. It appears that he was acquitted of those charges.

Inmate Alleyne has failed to take advantage of any opportunity he has received from the criminal justice system to turn his life around. He continues to commit serious crimes including crimes of violence against other people and was on parole at the time he committed his current offense. To call Mr. Alleyne a "non-violent" offender borders on the absurd. His criminal history is replete with arrests and convictions for offenses involving violence and the possession and use of firearms. To call his strike offenses "non-violent" is offensive. Kicking in the front door of a residence while threatening to kill his wife and others present all in the presence of his 1 year-old daughter are violent actions under any rationale definition of the word.

For these reasons the Sacramento County District Attorney's Office strongly believes that he is not an appropriate candidate for early parole. Inmate Alleyne has demonstrated that he poses a consistent and continuous unreasonable risk to public safety. In addition to being a gang member and a drug dealer, it is also clear that he will resort to violence to achieve what he wants. As a result, his application for early parole should be denied.

Respectfully,

A handwritten signature in black ink, appearing to read 'Michael Kane', enclosed within a large, hand-drawn oval.

Michael Kane  
Supervising Deputy District Attorney  
Sacramento County District Attorney's Office

RG/mc