

### **Introduction and Summary of Relief Requested**

A Chinese proverb teaches that a thousand-mile journey begins with the first step. Since his incarceration began sixteen long years ago, the Defendant, petitioning this Court from prison, feels as if he has walked that thousand-mile journey and more. Hence, on bended knees, Mr. Gonzalez, praying for mercy, moves this Court to modify his prison sentence by allowing him to return to his native Argentina where, *as demonstrated below*, the unusually loving members of his family continue to wait to receive him.

In addition, as shown in attached letters by Mr. Gonzalez himself, and others who, over the course of his years of incarceration, have come to know him, the man, through careful reflection and conscious resolve, has successfully internalized a heightened sense of civility, specifically by cultivating within himself (1) the refinement of his character; (2) selflessness towards others, (3) dedicated industriousness, (4) insight into how the impulses of his mind work, and most important of all, (5) confessed remorse and meaningful penitence for the grievous offenses he committed.

Hence, pursuant to the Sixth and Fourteenth amendments to the United States Constitution, and C.G.S. ss53a-39, 54-227, P.N. s.43-21, Mr. Gonzalez, through undersigned counsel, moves this Court to grant his motion for sentence modification, specifically praying that his current sentence be reduced to time served on the unbending condition that upon release, Mr. Gonzalez will, immediately and without delay, permanently return to his home in South America. Undersigned counsel asks this Court to note that, federal immigration law mandates the immediate deportation of the Argentinian national upon his release from prison.

Having already served about sixteen (16) years of his twenty-eight (28) year sentence that began in 2008 and which is due to end in 2036, App. page 55, Mr. Gonzalez is eligible for parole in 2033, nine years away, as the time of this writing in May of 2024.

**Excerpts from the trailer to an imaginary movie:**

**“Juan Gonzalez’s Motion for Sentence Modification”**

(coming soon to a theater near you)

If undersigned counsel could transform the instant legal motion into a motion picture, the Court, through a trailer to that film, would be able to see to the faces, facial expressions, and humanity, and hear the words, of those who, reflected in the following pages, attest to the integrity of Mr. Gonzalez’s character and, transformation over the past sixteen years. Here are some excerpts from that imaginary trailer:

Chaplain Smith: *“I can attest to Mr. Gonzalez’s tremendous positive character.”*

Deacon Williams: *“Mr. Gonzalez is passionate about his family . . . and proudly celebrates his kids’ achievements.”*

Program Mentor Kevin Brown: *“Mr. Gonzalez has been a perfect example of how a man should conduct himself.”*

Former Inmate Michael Johnson: *“I became a better man because of Juan Gonzalez.”*

Mr. Gonzalez’s son, JoseLuis: *“I’m grateful to God for being your son, you have always been my super hero.”*

Mr. Gonzalez’s sister, Martha: *“I will never forget you . . . I miss you so much little brother.*

Mr. Gonzalez’s brother, Ronny: *“I have always seen you as a father figure and I love you.”*

Mr. Gonzalez’s sister, Yulisa: *“The best memories of my childhood were with my lovely brother and protector . . .”*