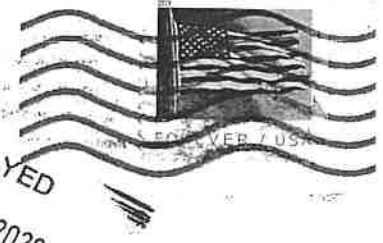


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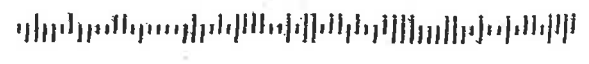
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Regulation Docket Clerk
Office of Legal Policy, U.S. Department of Justice
950 Pennsylvania Avenue N.H.
Room 4234
Washington, D.C. 20530

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Florida Action Committee, Inc.
6615 W Boynton Beach Blvd #414
Boynton Beach, FL 33437
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September 3, 2020

Regulations Docket Clerk
Office of Legal Policy, U.S. Department of Justice
950 Pennsylvania Avenue NW
Room 4234
Washington, DC 20530

RE: DOCKET NO. OAG 157 – COMMENTS ON SORNA

I am President of the Florida Action Committee (FAC). We are a 2000+ member non-profit organization that advocates for public safety and laws based on empirical research. Among our members are persons required to register as sexual offenders or sexual predators in Florida.

Our organization is strongly opposed to the proposed changes to the Sex Offender Registration and Notification Act (“SORNA”) in their current form unless SORNA is amended to act as a ceiling and not a floor, when it comes to requirements imposed on persons required to register as sexual offenders.

In *United States v. Kebodeaux*, 570 U.S. 387, 398 (2013), the Supreme Court stated that SORNA reduced the duration of Kebodeaux’s registration requirement from the lifetime requirement imposed by Texas law, and reduced the frequency with which Kebodeaux must update his registration to every six months from every 90 days as imposed by Texas law. By now imposing requirements that are *the greater of* either federal, state or municipal laws, we create a huge disparity among people who were convicted of the exact same offense but who happen to live in different jurisdictions. That result is directly in conflict with the stated intent of SORNA, which is to create uniformity among jurisdictions.

Our organization sees first-hand the confusion created by having to navigate the state statutes, county and city ordinances and a federal Act when complying with “registration requirements”. These dramatically varying rules and restrictions often conflict with each other and confuse not only the individuals who must comply with them, but the agencies that must enforce them.

These new requirements impose vague additional requirements, which in Florida require in-person registration. For example, SORNA will now require that a sex offender who is not employed at a fixed location such as a landscaper or construction worker must provide authorities information describing where he/she will be working *with whatever definiteness is possible*. Will this require a daily trip to the sheriff's office to announce a new site or route? These sort of requirements can preclude employment in certain fields altogether and we all know how difficult it is for people saddled with this stigma to secure employment to begin with.

Most importantly, in the fifteen years that SORNA has been in effect, there is zero (0) evidence proving its effectivity. Study after study presents no evidence that SORNA effectively reduces sex crime recidivism. In the absence of any proof that this is effective and in the face of so much evidence that registration only destabilizes and creates a barrier to successful reentry to a population that already has a low rate of recidivism, we strongly implore you to reconsider SORNA in its entirety.

Sincerely,



Gail Colletta, President
The Florida Action Committee, Inc.