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Docket No. OAG 157

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Thank you for the opportunity to provide feedback on the proposed rule changes reported in the Federal Register Vol. 85, No. 157, Docket No. OAG 157.

1. If the Attorney General is granted the authority to interpretation and implementation of SORNA, interpretations can be changed with each new administration or appointment.
2. These potential changes could require Sex Offenders to comply with ever changing requirements that may or may not be known to them, resulting in higher recidivism rates, incarcerations and cost increases at all phases.
3. This could cause interruptions or even destroy families with rule changes based on political goals.
4. May create a whole nightmare of legal cases for violations to the potentially ever-changing interruptions.
5. Sex Offenders caught up in this process could incur large legal fees to prove unintended violations. It is safe to assume a large majority of Sex Offenders live and work poverty level or below forcing them to suffer repercussions due to the inability to pay for legal fees or maintain jobs because of incarceration pending court actions to prove their ignorance of the changes.
6. The proposed rule implements requirements for Sex Offenders to register for convictions prior AWA implementation. This is really destructive and could create a legal nightmare for offenders who have not reoffended post AWA and SORNA laws in place since July 27, 2006 or 14 years ago.
 - a. This published change could potentially be in direct conflict with state rulings that do not requiring Sex Offenders to register if the crime was committed prior to the AWA. Many of states have added to the baseline of the SORNA with additional requirements. This would cause additional hardship in areas such as living and working restrictions that they currently do not have to adhere to. It could push many Sex Offenders into homeless situations as it does now to Sex Offenders registering after the enactments of the AWA.
 - b. Without understanding the punishment of registering as a Sex Offender, this change would potentially destroy families due to financial and emotional stressors.
7. There should be limits set and oversight of the interpretation and implementation that the Attorney General creates. Without this, the Attorney General would be free to make changes without public input as required by current Congressional vetting processes.



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