

In the Supreme Court
Appeal from the Michigan Court of Appeals

PEOPLE OF THE STATE OF MICHIGAN,

Plaintiff-Appellee,

v.

Supreme Court Case No. 146478

Court of Appeals No. 06-001700-FC

RAYMOND CURTIS CARP,

Lower Court No. 307758

Defendant-Appellant

PEOPLE OF THE STATE OF MICHIGAN,

Plaintiff-Appellee,

v.

Supreme Court Case No. 146819

Court of Appeals No. 314080

CORTEZ ROLAND DAVIS,

Lower Court No. 94-2089

Defendant-Appellant

PEOPLE OF THE STATE OF MICHIGAN,

Plaintiff-Appellee,

v.

Supreme Court Case No. 147428

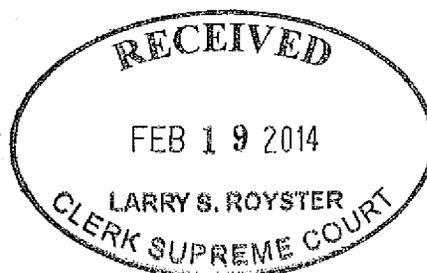
Court of Appeals No. 302353

DAKOTA WOLFGANG ELIASON,

Lower Court No. 10-015309FC

Defendant-Appellant

**AMICUS CURIAE BRIEF ON BEHALF OF
FAITH-BASED ORGANIZATIONS AND
RELIGIOUS LEADERS**



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INTRODUCTION

Amici curiae represent faith-based organizations comprised of members with diverse backgrounds, traditions, and perspectives, as well as leaders of different religious denominations.² Despite their varied religious affiliations and traditions, *amici* share the common and firm belief that the United States Supreme Court's opinion in *Miller v. Alabama*, ___US___; 132 S Ct 2455; 183 L Ed 407 (2012), should be applied to the cases of Raymond Curtis Carp, Cortez Roland Davis, and Dakotah Wolfgang Eliason so that each receives an individualized sentencing that allows the court to consider fully the mitigating factors such as youth and the capacity for rehabilitation.

In *Miller v. Alabama*, the Court held that “the Eighth Amendment forbids a sentencing scheme that mandates life in prison without possibility of parole for juvenile offenders.” 132 S Ct at 2469. In the decisions below, the Court of Appeals determined incorrectly that *Miller* does not apply retroactively to cases on collateral review or, in one case, that the only option for resentencing was life with or life without the possibility of parole.

Faith-based organizations and religious leaders offer unique insights into the application of the Eighth Amendment, which necessarily requires courts to scrutinize the morality of a punishment, either facially or as applied to certain circumstances. As the United States Supreme Court explained in *Atkins v. Virginia*, 536 US 304; 122 S Ct 2242; 153 L Ed 335 (2002), the views of religious groups about the morality of a particular punishment can provide evidence of a “broad[] social and professional consensus,” *id.* at 316 n. 21; 2249 n. 21, concerning the moral and ethical treatment of people convicted of crimes. Accordingly, the

² A full list of *amici*, with descriptions of each organization, is attached hereto as Appendix A.

undersigned faith-based organizations and religious leaders wish to show that, in addition to being supported by the United States Supreme Court's precedents, retroactive application of *Miller* to cases on collateral review is also the morally correct decision that complies with the ideals underlying the Eighth Amendment.

ARGUMENT

In *Miller v. Alabama*, the United States Supreme Court announced a rule designed to eliminate the "great. . . risk of disproportionate punishment" that results from sentences that mandate life without parole for children. 132 S Ct at 2469. The Court held that no child could receive the sentence of life without parole unless the sentencing court considered mitigating factors such as age and capacity for rehabilitation. 132 S Ct at 2469.

Notwithstanding *Miller*, many individuals whose cases are currently on collateral review continue to suffer from unconstitutional, mandatory life-without-parole sentences for crimes that occurred when they were children. To deny these people the individualized sentencing under the rule articulated in *Miller* merely because their sentences were final before the Supreme Court issued its opinion would result in a grave inequity and condemn numerous juveniles to spend the rest of their lives in prison without regard to their special circumstances or rehabilitation. To avoid this injustice, this Court should apply *Miller* to cases on collateral review.

I. Mandatory Life-Without-Parole Sentences For Children Are At Odds With The Moral Values That Animate The Eighth Amendment.

As the United States Supreme Court has acknowledged, life without parole is an extraordinarily severe sentence. Life without parole "means denial of hope; it means that good behavior and character improvement are immaterial; it means that whatever the future might hold in store for the mind and spirit of [the convict], he will remain in prison for the rest of his

days.” *Graham v. Florida*, 560 US 48, 70; 130 S Ct 2011, 2027; 176 L Ed 825 (2010) (quoting *Naovarath v. State*, 105 Nev 525, 526; 779 P 2d 944 (1989)). To impose such a drastic sentence on a child, without taking “into account how children are different,” is beyond the scope of what a moral society can countenance. *Miller*, 132 S Ct at 2469; *see also Roper v. Simmons*, 543 US 551, 570; 125 S Ct 1183, 1195-96; 161 L Ed 2d 1 (2005) (“From a moral standpoint it would be misguided to equate the failings of a minor with those of an adult, for a greater possibility exists that a minor’s character deficiencies will be reformed.”).

A. Religious teachings recognize the importance of compassion and forgiveness.

The world’s faith-based traditions consistently recognize values fundamental to a moral society that are at odds with mandatory sentences of life without parole for children. Religious texts counsel that it is the most vulnerable members of society who are most in need of compassion. *See, e.g., Psalms* 82:3 (“Give justice to the weak and the orphan; maintain the right of the lowly and the destitute.”); *Qur’an* 2:83 (“[T]reat with kindness your parents and kindred, and orphans and those in need.”). And the Unitarian faith, for instance, recognizes “[j]ustice, equity and compassion in human relations” as one of its seven principles. *See* Unitarian Universalist Association of Congregations, *Our Unitarian Universalist Principles and Sources* <<http://www.uua.org/beliefs/principles/index.shtml>> (accessed February 14, 2014).

Numerous religious texts emphasize the importance of forgiveness and mercy. *See, e.g., Qur’an* (Abdullah Yusuf Ali Edition, 1934), 7:199 (“Hold to forgiveness, command what is right; But turn away from the ignorant.”); *Id.* at 7:156 (“My mercy extendeth to all things.”); *Id.* (Sahih International Edition) at 76:8 (“And they give food in spite of love for it to the needy, the orphan, and the captive.”); *Matthew* 5:7 (New Revised Standard Version) (“Blessed are the merciful, for they will receive mercy.”); *Luke* 6:36-37 (“Be merciful, just as your Father is merciful. ‘Do not judge, and you will not be judged; do not condemn, and you

will not be condemned. Forgive, and you will be forgiven.”); *Psalms* 103:3 (“[W]ho forgives all your iniquity, who heals all your diseases.”).

Religious texts likewise recognize that vengeance should be avoided as a basis for action. *Leviticus* 19:18 (“You shall not take vengeance or bear a grudge against any of your people, but you shall love your neighbor as yourself.”); *Romans* 12:17-21 (“Do not repay anyone evil for evil, but take thought for what is noble in the sight of all. If it is possible, so far as it depends on you, live peaceably with all. Beloved, never avenge yourselves, but leave room for the wrath of God, for it is written, ‘Vengeance is mine, I will repay, says the Lord.’ No, ‘if your enemies are hungry, feed them; if they are thirsty, give them something to drink; for doing this will heap burning coals on their heads.’ Do not be overcome by evil, but overcome evil with good.”); *1 Thessalonians* 5:15 (“See that none of you repays evil for evil, but always seek to do good to one another and to all.”).

These basic moral exhortations animate the Eighth Amendment’s prohibition of “cruel and unusual” punishment and dictate against permitting mandatory life without parole sentences for children.

B. Religious traditions recognize that children and adults are different and should be treated differently.

The categorical differences between children and adults establish why imposing mandatory life without parole on a child is contrary to the Eighth Amendment and the fundamental values that give it life.

As the United States Supreme Court observed, children’s lack of maturity may lead them to exhibit “recklessness, impulsivity and heedless risk-taking.” *See Miller*, 132 S Ct at 2464. And children are typically far more impressionable than adults, making them more susceptible to negative influences and outside pressures. 132 S Ct at 2467. As adults,

individuals have grown out of these “hallmark features” of childhood. 132 S Ct at 2468. Adults are more capable of thinking through the consequences of their actions, more adept at discerning which of their companions provide models and advice worth following, and more proficient at handling life’s stresses and pressures. Therefore, children are less culpable than adults.

Religious traditions recognize the differences between children and adults, and the unfairness and iniquity of condemning a child to life in prison for mistakes made before this maturing process can occur. Children do not have the knowledge, life experience, and perspectives that guide adults. Paul’s first letter to the Corinthians, for instance, recognizes that children think categorically differently than adults. As Paul wrote, “When I was a child, I spoke like a child, I thought like a child, I reasoned like a child; when I became an adult, I put an end to childish ways.”) *1 Corinthians* 13:11; *see also id.* at 14:20 (“Brothers and sisters, do not be children in your thinking; rather, be infants in evil, but in thinking be adults.”). For the same reasons, forgiveness and mercy may attach more easily to children. *See, e.g., Psalms* 25:7 (“Do not remember the sins of my youth or my transgressions; according to your steadfast love remember me, for your goodness’ sake, O Lord!”).

In addition, parents have a duty to protect and nurture their children, and just, constitutional sentencing should consider whether parental involvement has been lacking in a child’s life. Indeed, the Torah advises that it is the responsibility of a parent to rear his or her children well and teach them how to function in society. As it is stated in *Deuteronomy*, we are instructed to “[k]eep these words that I am commanding you today in your heart. Recite them to your children and talk about them when you are at home and when you are away, when you lie down and when you rise.” *Deuteronomy* 6:6-7. Thus, as explained in *Miller*, a child’s parental

and other life circumstances should be an important consideration in determining an appropriate sentence. *Miller*, 132 S Ct at 2467.

Finally, as recognized in *Miller*, a child is even less culpable if he was merely an accessory to the offense. *See* 132 S Ct at 2468 (condemning mandatory life without parole sentences for children as precluding consideration of “the extent of [the juvenile defendant’s] participation in the conduct”). This principle accords with religious teaching. The Qur’an, for instance, instructs, “No soul shall bear the burden of another.” *Qur’an*, 17:15; 35:18; 39:7; 53:38.

C. Religious doctrines recognize that juveniles should have the opportunity for rehabilitation and redemption.

Religious traditions recognize the possibility for rehabilitation and reform, which are, by definition, denied by a mandatory sentence of life without parole. For example, Reform Judaism “reaffirm[s] the Biblical concept that the criminal is a human being, capable of reshaping his or her life.” *See* Religious Action Center of Reform Judaism, *Criminal Justice and Jewish Values* <http://www.rac.org/Articles/index.cfm?id=1713&pge_prg_id=8107&pge_id=2388> (accessed February 14, 2014).

And children have a particular capacity for rehabilitation and reform. *See Miller*, 132 S Ct at 2467-68. During childhood, the malleability of a person’s character is at its zenith. Therefore, a person who commits a crime as a child is particularly open to recognizing the error of his or her ways and to finding a means of redeeming him or herself. Sentencing a child to life without parole inappropriately assumes that such redemption is not possible, in contravention of basic religious teachings.

Moreover, by permanently separating a child from society, a life-without-parole sentence inappropriately impedes that child’s ability to seek redemption through interaction with

the society against which the child has transgressed. This, too, is not in accord with the religious beliefs of *amici curiae*. See *Ezekiel* 33:11 (“I have no pleasure in the death of the wicked, but that the wicked turn from their ways and live.”). As the United States Supreme Court has explained “[b]y denying the defendant the right to reenter the community, the State makes an irrevocable judgment about that person’s value and place in society.” *Graham*, 560 US at 74; 130 S Ct at 2030.

D. Retroactive application of *Miller* is necessary in a just society.

A just society must be guided by the principle that people in similar situations must be treated equally. A person whose mandatory sentence of life without parole for a youthful offense became final before *Miller* was no less vulnerable to the circumstances giving rise to poor-decision making, and is no less likely to redeem him or herself, than a child whose sentence became final after the decision. To allow the fortuity of a case’s timing to produce fundamentally disparate treatment of defendants violates the precedent of *Leviticus* 19:15, which states “[y]ou shall not render an unjust judgment; you shall not be partial to the poor or defer to the great: with justice you shall judge your neighbor.” It is inequitable, and cruel, to refuse to apply *Miller* retroactively to offenders whose cases are on collateral review, merely because of something as arbitrary as the procedural posture of their cases. See *Hill v. Snyder*, ___ F Supp 2d ___; 2013 WL 364198 *1-2 (ED Mich) (“Indeed, if ever there was a legal rule that should—as a matter of law and morality—be given retroactive effect, it is the rule announced in *Miller*. To hold otherwise would allow the state to impose *unconstitutional* punishment on some persons but not others, an intolerable miscarriage of justice.”).

II. Taken Together, the Cases of Raymond Curtis Carp, Cortez Roland Davis, and Dakota Wolfgang Eliason Illustrate Why Retroactive Application of *Miller* and Individualized Sentencing Are Necessary.

The cases of Raymond Curtis Carp, Cortez Roland Davis, and Dakotah Wolfgang Eliason support the imperatives that *Miller* be applied retroactively and that individualized sentencing is necessary, especially for juveniles. Through its opinion in *Miller*, the United States Supreme Court has “require[d] [sentencing courts] to take into account how children are different, and how those differences counsel against irrevocably sentencing them to a lifetime in prison.” *Miller*, 132 S Ct at 2469. As discussed above, a wide collection of religious texts also strongly support consideration of these differences.

A. Raymond Curtis Carp

The court in Raymond Curtis Carp’s case was prohibited from considering how children are different and how those differences counsel against an irrevocable life sentence, even though those differences were directly relevant to Raymond’s case.³

First, in reaching its decision in *Miller*, the United States Supreme Court urged lower courts to consider the fact that children are more susceptible than adults to negative influences. 132 S Ct at 2467-68. One reason the Court condemned mandatory life without parole sentences for children was that these sentences precluded courts’ consideration of “the circumstances of the . . . offense, including the extent of [the juvenile’s] participation in the conduct and the way familial and peer pressures may have affected [the juvenile].” 132 S Ct at 2468.

The extent of Raymond Carp’s participation in the charged conduct and his susceptibility to familial influence were both at issue in his case, but they could not be

³ The facts and quotations appearing in this brief are taken from Raymond Curtis Carp’s, Cortez Roland Davis’s, and Dakotah Eliason’s respective Applications for Leave to Appeal filed in this Court.

considered at sentencing. Raymond was only 15 years old at the time of the offense and was at the home of Mary Ann McNeely visiting his older half-brother, Brandon Gorecki, and Mr. Gorecki's infant daughter. A fight between Mr. Gorecki and Ms. McNeely escalated, and Ms. McNeely was killed.

The record reflects that the degree of Raymond's participation in the murder is questionable. A witness testified that Raymond told her that he had shut the blinds at Mr. Gorecki's direction, threw a mug at Ms. McNeely, held Ms. McNeely down, and handed Mr. Gorecki a knife. Raymond described Mr. Gorecki as "mad as hell" and testified that while Mr. Gorecki was grabbing Ms. McNeely's hair and hitting her, he "just sat down and stared at the wall." Raymond admitted to closing the blinds and hitting Ms. McNeely with a cup, but, after that, he said he just stood back and watched. According to the testimony of a Michigan State Police detective, no blood was found on Raymond's clothes.

Mr. Gorecki had a significant amount of power over Raymond. Mr. Gorecki was seven years older than Raymond and had a history of drug use and violence. Mr. Gorecki was intimidating to the people who lived with him: Mr. Gorecki's mother, his mother's boyfriend, and his girlfriend each testified that they were afraid of Mr. Gorecki. When Mr. Gorecki was asked if he held a gun to Raymond's head, he said, "Basically." And, although he denied expressly threatening Raymond, Mr. Gorecki acknowledged that Raymond may have felt threatened.

Second, the United States Supreme Court counseled in *Miller* that lower courts should consider children's particular capacity for rehabilitation and reform. 132 S Ct at 2467-68. The Court criticized mandatory life without parole sentences for children as "disregard[ing] the possibility of rehabilitation even when the circumstances most suggest it." 132 S Ct at 2468.

Because Raymond received a mandatory life without parole sentence, his demonstrated capacity to recognize the error of his ways and his potential for reform were ignored.

Raymond's actions soon after Ms. McNeely was murdered illustrate the guilt and remorse he feels about his actions. Witnesses testified that Raymond was visibly upset and crying when he talked about the murder. One witness also testified that Raymond told her that he felt helpless and guilty during the attack. One week after the murder, Raymond was admitted to the hospital, having attempted suicide. Raymond told the doctor and nurses that he saw his brother kill Ms. McNeely, who he regarded as his aunt. Raymond said that he had nightmares and saw the murder whenever he closed his eyes, and he expressed guilt over not stopping his half-brother.

Despite the relevance to his case, and contrary to *Miller* and *amici*'s religious traditions, Raymond's sentencing court was unable to take into consideration how children are different and how those differences counsel against an irrevocable life sentence.

B. Cortez Roland Davis

The court in Cortez Roland Davis's case was similarly prevented from considering how children are different and how those differences counsel against an irrevocable life sentence. Given Cortez's tumultuous upbringing and other mitigating factors, the court should have had the opportunity to consider Cortez as an individual.

First, in *Miller* the United States Supreme Court emphasized the importance of considering a child's life circumstances when determining the appropriate sentence. 132 S Ct at 2467. The Court found fault with mandatory penalties because, under these schemes, "the child from a stable household" will automatically receive the same sentence as "the child from a chaotic and abusive one" because the sentence "prevents taking into account the family and home environment." 132 S Ct at 2467-68. Because Cortez received a mandatory sentence of life

without parole, the sentencing court was prohibited from considering the heartbreaking and challenging circumstances that shaped his childhood.

By the time Cortez was 16 years old and was involved in a robbery that resulted in a death, he had already faced trials and tribulations that would test even the most mature adult. When Cortez was born, his mother was only sixteen years old and was struggling to care for his two-year old sister. Cortez's father passed away from drug use when Cortez was just nine years old, and his mother turned to using and dealing drugs. Cortez and his siblings were neglected. They did not have sufficient food to eat. And they lived in uninhabitable conditions, dealing with inoperable plumbing, filth, and vermin infestation. Cortez and his siblings were moved out of their home by Child Protective Services on multiple occasions due to abuse and neglect. Cortez dropped out of school when he was in the eighth grade to support himself and his siblings. At one point, Cortez was homeless. As the court said during a re-sentencing hearing, "somebody's been throwing this young man away from the day he was born."

Second, *Miller* condemned mandatory life without parole sentences for children as precluding consideration of the "circumstances of the homicide offense, including the extent of [the juvenile defendant's] participation in the conduct." 132 S Ct at 2468. The United States Supreme Court explained that one of the cases before it illustrated the problem. *Id.* The defendant in that case, Kuntrell Jackson, did not fire the bullet that killed the victim. *Id.* The Court held that, before depriving Kuntrell of any prospect of release from prison, the sentencer should consider how his "age could well have affected his calculation of the risk" and how his level of involvement in the conduct went directly to his "culpability for the offense." *Id.* Although Cortez's case is similar to Kuntrell's case, through which the Supreme Court

highlighted the problems with mandatory sentences of life without parole for children, Cortez's sentencing court was unable to consider the circumstances of the homicide offense in his case.

Throughout Cortez's case, the court explained that Cortez was an aider and abettor in an armed robbery, but, like Kuntrell, Cortez did not shoot the victim. Cortez's age "could well have affected his calculation of the risk" involved with the robbery. *Id.* And the fact that he did not pull the trigger lowers Cortez's culpability.

Third, as discussed above, the United States Supreme Court in *Miller* urged lower courts to consider children's particular capacity for rehabilitation and reform. 132 S Ct at 2467-68. Throughout Cortez's sentencing and re-sentencing hearings, the court expressed its belief that "everyone agrees that [Cortez] is capable of rehabilitation" and that Cortez is "salvageable." But, contrary to *Miller*, the court was unable to take this into consideration when determining Cortez's sentence.

Cortez's sentencing court was prevented from considering how children are different and how those differences counsel against an irrevocable life sentence.

C. Dakota Wolfgang Eliason

Although the court of appeals properly held that *Miller* applies to Dakota Wolfgang Eliason's case, the court erred by requiring the sentencing court to impose on him a sentence of life incarceration, either with or without the possibility of parole. This limitation did not allow the sentencing court to give Dakota a truly individualized sentencing that fully considered the factors emphasized in *Miller*. And these individualized factors are directly relevant to Dakota's case.

In reaching its decision in *Miller*, the United States Supreme Court explained that sentencing courts should take into account the fact that children may be the most susceptible to psychological damage. 132 S Ct at 2467. The Court explained that "the background and mental

and emotional development of a youthful defendant [must] be duly considered in assessing his culpability.” *Id.* (quotation marks and citation omitted). Under the sentencing scheme proposed by the court of appeals in Dakotah’s case, the sentencing court will not be able to formulate a sentence that fully reflects Dakotah’s background, emotional development, and susceptibility to psychological damage.

Dakotah was fourteen years old when he shot and killed his grandmother’s husband. As explained during an evidentiary hearing by Dr. James Henry, the Director of the Southwest Michigan Children’s Trauma Assessment Center, Dakotah was suffering from “toxic stress.” Within a short period of time, Dakotah’s mother terminated her parental rights, his dog died, his friend committed suicide, his cousin died in an accident, and his father lost his job, which was going to require the family to move in with the grandparents.

These events amounted to a “striking” emotional loss with a significant impact on Dakotah’s emotional development. According to Dr. Henry, these events would have caused intense loneliness, separation, emotional pain, racing thoughts, sleeplessness, hyperarousal, and disassociation in a child of Dakotah’s age. Before shooting his grandfather, Dakotah contemplated suicide. Dr. Henry formally diagnosed Dakotah with Post-Traumatic-Stress-Disorder and explained that Dakotah’s youthfulness at the time of the shooting exacerbated the symptoms, because a fourteen-year old lacks the cognition, resources, and relationships to cope. Dr. Henry believes that the shooting was an isolated act and was explained by Dakotah’s trauma.

Further, Dakotah’s apparent lack of remorse after the crime was a central issue at Dakotah’s trial. However, as Dr. Henry explained, children who are traumatized, such as Dakotah, often dissociate so they do not express emotion.

Despite the relevance to his case, and contrary to *Miller* and *amici*'s religious traditions, the court in *Dakotah*'s case was unable to fully consider the factors that diminish a child's culpability.

* * *

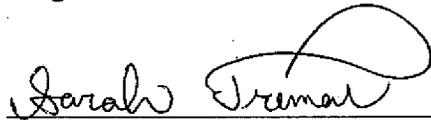
Raymond, Cortez, and *Dakotah* had no real opportunity to present mitigating evidence regarding their youth, susceptibility to influence, and potential for rehabilitation. Consideration of these factors is compelled by *amici*'s religious teachings. And, as the Supreme Court explained, consideration of these factors is important to distinguishing between "juvenile offender[s] whose crime[s] reflect[] unfortunate yet transient immaturity," who do not deserve life without the possibility of parole, "and the rare juvenile offender[s] whose crime reflect[] irreparable corruption." 132 S Ct at 2469. Raymond, Cortez, and *Dakotah* should not be denied the opportunity to present mitigating evidence regarding these factors now, merely because their cases became final before the Supreme Court recognized the gravity of this injustice. Further, upon resentencing, the sentencing court should be given the latitude to sentence juveniles, such as Raymond, Cortez, and *Dakotah*, to a term of years if it determines that is the most appropriate sentence considering the factors set forth in *Miller*.

CONCLUSION

For the foregoing reasons, *amici curiae* faith-based organizations and religious leaders respectfully request that this Court reverse the decision below.

Dated: _____

Respectfully submitted,
Amici Curiae faith-based organizations and
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APPENDIX A --AMICI CURIAE

Faith-Based Organizations

1. *American Correctional Chaplains Association*: The American Correctional Chaplains Association serves as a professional organization for pastoral care personnel in the corrections field, advances the role of correctional chaplains, and communicates the religious and spiritual aspects of corrections to the larger community.
2. *Congregation of St. Joseph*: The Congregation of St. Joseph is a community of nearly 700 vowed women religious dedicated to the love of God and neighbor, committed to sharing life together in community, and missioned to be a unifying presence wherever they live and minister. The Congregation of St. Joseph is joined in this commitment by more than 500 lay associates.
3. *CONTACT: Celebrating Our Network of Trust, Accountability, Collaboration and Training*: CONTACT is a support group for those affected by crime and incarceration.
4. *Crossroad Bible Institute*: Crossroad Bible Institute is an international discipleship and advocacy ministry for prisoners and their families.
5. *Engaged Zen Foundation*: The Engaged Zen Foundation ("EZF") is dedicated to alleviating tangible suffering in the world. Where Zen Buddhism encourages careful investigation of an individual life, EZF underscores the inescapable need to take that understanding "into the marketplace." EZF was founded in 1992 with a focus on prisons. Incarceration and depredations continue to be a focal point of EZF's mission, but EZF also concerns itself with human rights violations and human needs in whatever form they may occur.
6. *Episcopal Church of Incarnation*: The Episcopal Church of Incarnation is a small Episcopal Church located in Pittsfield Township, Michigan.
7. *Jewish Prisoner Services International*: Jewish Prisoner Services International has its origins as an agency of B'nai B'rith International. It currently functions as an outreach program to provide spiritual and advocacy services for Jewish prisoners, and assistances to their families, releasees, probationers, et cetera.
8. *Michigan Conference United Church of Christ*: The Michigan Conference of the United Church of Christ equips clergy and churches for faithful leadership and effective ministries of spiritual discernment, prophetic integrity, compassionate generosity, and vital growth.
9. *Office of Social Justice, Christian Reformed Church in North America*: The Office of Social Justice is a ministry of the Christian Reformed Church that responds to God's call to let justice flow in our personal and communal lives, especially as it relates to hunger and poverty.

10. *Pine River Friends Meeting*: The Pine River Meeting of the Religious Society of Friends is a member of the Green Pastures Quarterly Meeting and Lake Erie Yearly Meeting of the Religious Society of Friends. The Religious Society of Friends (Quakers) as a Christian body was formed in the middle of the 17th Century in England. Throughout its history it has opposed capital punishment and supported the amelioration of the suffering of prisoners.
11. *Sisters, Servants of the Immaculate Heart of Mary of Monroe, Michigan*: Sisters, Servants of the Immaculate Heart of Mary of Monroe, Mich., are Catholic women bound together in faith. Urged by the love of God to respond to the most serious needs of our time, they pursue justice, peace and sustainable ways of life. The community of more than 360 vowed sisters and 125 associates minister in education, pastoral care, spiritual development, social services, mental and physical health, and social justice — throughout the United States and in Canada, Puerto Rico, Mexico and South Africa.
12. *Unitarian Universalist Association*: The Unitarian Universalist Association is a religious organization that combines two traditions: the Universalists, who organized in 1793, and the Unitarians, who organized in 1825. They consolidated into the Unitarian Universalist Association in 1961.

Religious Leaders

1. *The Rev. David Bell*
Interfaith Center for Spiritual Growth
2. *Rabbi Robert Dobrusin*
Beth Israel Congregation
3. *The Rev. Mark Evens*
First Unitarian Universalist Congregation
4. *The Rev. Wendell Gibbs (Ret.)*
Bishop of Michigan
5. *The Rev. Susan Harries*
St. James Episcopal Church
6. *The Rev. Mark Hastings*
St. Michael and All Angels Episcopal Church
7. *The Rev. James Jones*
Oakdale Park Christian Reformed Church
8. *Natalie Kellogg*
Work at Reservation

United Church of Christ

9. *The Rev. Dr. Julie Nemecek*
Equality Michigan
10. *The Rev. Brooke Pickrell*
Northside Presbyterian Church
11. *The Rev. Rayford J. Ray (Ret.)*
Episcopal Diocese of Northern Michigan
12. *The Rev. Dr. JoAnn Kennedy Slater, J.D.*
Rector, St. Luke's Episcopal Church
13. *The Rev. Joseph Summers*
Episcopal Church of the Incarnation
14. *Nancy Taylor*
Religious Society of Friends (Quakers)
15. *The Rev. Ian Reed Twiss*
Holy Faith Church
Episcopal
16. *The Rev. Rich Rienstra*
CONTACT: Celebrating Our Network of Trust, Accountability, Collaboration and
Training
17. *The Rev. Gabriel Weinreich*
University of Michigan
Retired Ordained Priest of the Episcopal Church
18. *Jan Wright*
Friends Meeting