No:

In the
Supreme Court of the United States

SUNNY ROBINSON

Petitioner,

vs.

UNITED STATES OF AMERICA,

Respondent.

ON PETITION FOR WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS
FOR THE FIFTH CIRCUIT

PETITION FOR WRIT OF CERTIORARI

Sunny Robinson
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QUESTIONS PRESENTED FOR REVIEW

I. Should a writ of certiorari be granted to determine whether the District Court and the Fifth Circuit erred in not granting relief under Title 18 U.S.C. § 3582.

II. Did the district court have the authority to reduce Robinson's sentence under Title 18 U.S.C. § 3582.

PARTIES TO THE PROCEEDINGS
IN THE COURT BELOW

In addition to the parties named in the caption of the case, the following individuals were parties to the case. The United States Court of Appeal for the Fifth Circuit and the United States District Court for the Southern District of Texas.

None of the parties is a company, corporation, or subsidiary of any company or corporation.

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I, Sunny Robinson, the Petitioner herein, respectfully prays that a Writ of Certiorari is issued to review the judgment of the United States Court of Appeals for the Fifth Circuit, entered in the above-entitled cause.

OPINION BELOW

The opinion of the Court of Appeals for the Fifth Circuit, whose judgment is herein sought to be reviewed, is an unpublished opinion in *United States v. Robinson,* 735 F. App'x 861 (5th Cir. 2018) and is reprinted as Appendix A to this petition.

The opinion in the denial of Robinson's Title 18 U.S.C. § 3582 is an unpublished opinion in *United States v. Robinson*, 09-422-1, District Court, Southern District of Texas and is reprinted as Appendix B to this petition.

STATEMENT OF JURISDICTION

The Second Circuit's denial of Petitioner's Title 28 U.S.C. § 2253 was entered on August 28, 2018.

The Jurisdiction of this Court is invoked pursuant to Title 28 U.S.C. § 1254(1).

CONSTITUTIONAL PROVISIONS, TREATIES, STATUTES AND RULES INVOLVED

The Sixth Amendment to the Constitution of the United States provides:

> In all criminal prosecutions, the accused shall enjoy the right to a speedy and public trial, by an impartial jury of the State and District wherein the crime shall have been committed, which District shall have been previously ascertained by law, and to be informed of the nature and cause of the accusation, to be confronted with the witness against him; to have compulsory process for obtaining witnesses in his favor, and to have the Assistance of Counsel for his defense.

Id. U.S. Const. amend. VI

Title 18 U.S.C. § 3582 provides in pertinent part:

(a) Factors to be considered in imposing a term of imprisonment. The court, in determining whether to impose a term of imprisonment, and, if a term of imprisonment is to be imposed, in determining the length of the term, shall consider the factors set forth in section 3553(a) [18 USCS § 3553(a)] to the extent that they are applicable, recognizing that imprisonment is not an appropriate means of promoting correction and rehabilitation. In determining whether to make a recommendation concerning the type of prison facility appropriate for the defendant, the court shall consider any pertinent policy statements issued by the Sentencing Commission pursuant to 28 U.S.C. 994(a)(2).

(b) Effect of finality of judgment. Notwithstanding the fact that a sentence to imprisonment can subsequently be—

(1) modified pursuant to the provisions of subsection (c);

(2) corrected pursuant to the provisions of rule 35 of the Federal Rules of Criminal Procedure and section 3742 [18 USCS § 3742]; or

(3) appealed and modified, if outside the guideline range, pursuant to the provisions of section 3742 [18 USCS § 3742];

a judgment of conviction that includes such a sentence constitutes a final judgment for all other purposes.

(c) Modification of an imposed term of imprisonment. The court may not modify a term of imprisonment once it has been imposed except that—

(1) in any case--

(A) the court, upon motion of the Director of the Bureau of Prisons, may reduce the term of imprisonment (and may impose a term of probation or supervised release with or without conditions that does not exceed the unserved portion of the original term of imprisonment), after considering the factors set forth in section 3553(a) [18 USCS § 3553(a)] to the extent that they are applicable, if it finds that—

(i) extraordinary and compelling reasons warrant such a reduction; or

(ii) the defendant is at least 70 years of age, has served at least 30 years in prison, pursuant to a sentence imposed under section 3559(c) [18 USCS § 3559(c)], for the offense or offenses for which the defendant is currently imprisoned, and a determination has been made by the Director of the Bureau of Prisons that the defendant is not a danger to the safety of any other person or the community, as provided under section 3142(g) [18 USCS § 3142];

and that such a reduction is consistent with applicable policy statements issued by the Sentencing Commission; and

(B) the court may modify an imposed term of imprisonment to the extent otherwise expressly permitted by statute or by Rule 35 of the Federal Rules of Criminal Procedure; and

(2) in the case of a defendant who has been sentenced to a term of imprisonment based on a sentencing range that has subsequently been lowered by the Sentencing Commission pursuant to 28 U.S.C. 994(o), upon motion of the defendant or the Director of the Bureau of Prisons, or on its own motion, the court may reduce the term of imprisonment, after considering the factors set forth in section 3553(a) [18 USCS § 3553(a)] to the extent that they are applicable, if such a reduction is consistent with applicable policy statements issued by the Sentencing Commission.

(d) Inclusion of an order to limit criminal association of organized crime and drug offenders. The court, in imposing a sentence to a term of imprisonment upon a defendant convicted of a felony set forth in chapter 95 [18 USCS §§ 1951 et seq.] (racketeering) or 96 [18 USCS §§ 1961 et seq.] (racketeer influenced and corrupt organizations) of this title or in the Comprehensive Drug Abuse Prevention and Control Act of 1970 (21 U.S.C. 801 et seq.), or at any time thereafter upon motion by the Director of the Bureau of Prisons or a United States attorney, may include as a part of the sentence an order that requires that the defendant not associate or communicate with a specified person, other than his attorney, upon a showing of probable cause to believe that association or communication with such person is for the purpose of enabling the defendant to control, manage, direct, finance, or otherwise participate in an illegal enterprise.

Title 18 U.S.C. § 3582

STATEMENT OF THE CASE

A. Course of Proceedings in the Lower Courts

In March 2005, Robinson formed Memorial Medical Supply. He was the sole owner of the business which a physical storefront 1009B Dairy Ashford, Houston, Harris County, Texas. A second location was operated at 1414 West Sam Houston Parkway North, Suite 150, Houston, Texas. In addition to the two physical locations, Memorial Medical Supply maintained a website that merchandise could be ordered through. The purpose of the business was to sell durable medical equipment. Shortly after establishing the business in 2005, Mr. Robinson applied for and obtained a Medicare provider number under the name "Sunny Robinson". After several failed attempts to secure Medicare billing privileges, in March 2006 MMS was approved to submit claims to be paid for filing prescriptions for durable medical equipment. Initially, Robinson did not prove himself to be a particularly successful as a seller of durable medical equipment or operating the business.

When the MMS business originally started and throughout the time it was in operation, Mr. Robinson's primary business was owning and operating postal box/check cashing stores since 1997. In October 2007, two years after MMS was formed and operating as an approved Medicare provider, Manuel Deluna. Deluna was hired after responding to an advertisement for a medical equipment sales position in the Greensheet.

Deluna was interviewed over the course of several days while, according to Deluna, Robinson was typically distracted by his check cashing/postal box business. At the time he was being interviewed by Robinson, Deluna did not reveal that he had been convicted of multiple State crimes and had repeatedly served time in the Texas Department of Criminal Justice, Institutional Division. Several weeks after Deluna was hired by MMS, while paperwork was being completed so that a Medicare billing number could be issued for Deluna, it was discovered that he had lied on his job application for MMS. While he had stated that he had not been convicted of any criminal activities, in fact, Deluna had a rather long history of convictions and prison time. His state criminal history included unauthorized use of a motor vehicle, possession of stolen property, burglary, theft of property, and as late as 2003, a conviction and two year sentence for forgery and misdemeanor theft. After discovering that Deluna had lied about his criminal history, Mr. Robinson discussed the matter with Deluna and accepted Deluna's representations that he had learned from his earlier mistakes and was ready to work in an honest manner.

Under the terms of his employment with MMS, Deluna was to be compensated a percentage of order that was written for equipment, regardless of whether or not the orders were actually completed, fully paid for by insurers, Medicare, Medicaid, and/or the actual customer who was receiving the merchandise. Under the terms of

the employment agreement Robinson made with Deluna, the actual completion of the transaction, including full payment, was not a factor in whether or not Deluna was paid for the order. The compensation terms between MMS and Deluna were worked out with the company's accountant, Mr. Binder.

Unwittingly, and clearly from not understanding the business, Robinson set MMS and himself up for likely failure because Deluna's compensation package, in the hands of the dishonest person Deluna had demonstrated he was and apparently continued to be after taking over the daily operations of MMS, appears to have incentivized Deluna to write up phony orders, or inflate the value of the orders to increase his commissions, to steal from the business
while his wife established a competing business, to create problems with deliveries by overseeing the filling of orders himself and then having the orders misdelivered by his relatives, and by placing himself in charge of addressing customer complaints where he could compound the errors and problems by not responding appropriately.

As noted, it was only after Deluna was hired and more particularly put in charge of the operations that Medicare sales shot up and in fact, the Government did not make a case that in the approximately two years before Deluna's involvement with the business there was any attempt to overbill Medicare or deny customers equipment that had been prescribed, substitute unneeded equipment for

prescribed equipment, or any other misdeeds. It was only after Deluna appeared and started taking and filling orders and ultimately operating the business did the problems that are the substance of the criminal charges become part of the business. Despite the fact that none of the Government's allegations of fraud by Robinson or MMS predate Deluna's employment and the fact that the business was started and qualified to bill Medicare for a significant amount of time before Deluna was employed, the Presentencing report states without any questioning its validity, in recounting information from a former employee, Tanya Dorel Bradley, that "Memorial was opened so that Robinson and Deluna could commit fraud." Deluna's employment was terminated from the company and the issue and complaints of appeal were also resolved 6 months prior to the indictment. After the billing issue was discovered, Deluna was terminated after the complaints began to arrive. Medicaid was contacted to address the complaints and the amounts Medicare reported as overbilled was $ 152,246.97. These billing errors were reimbursed completely as the bills were arriving at MMS. This omitted fact was entered into the record on the day of sentencing.

The Government originally sought forfeiture of Robinson's assets however abandoned the forfeiture claims after admitting in court that it could not actually prove how much money had been paid by Medicare due to the allegedly false claims.

After a four-day trial, a jury found Robinson guilty of (1) conspiracy to commit health care fraud in violation of 18 U.S.C. §§ 1347 and 1349 (count 1S); (2) fifteen counts of health care fraud in violation of 18 U.S.C. §§ 2 and 1349 (counts 2S through 16S); (3) conspiracy to violate the Anti-Kickback Statute in violation of 18 U.S.C. § 371 (count 16S); and (4) three counts of paying kickbacks in violation of 42 U.S.C. § 1320a-7b(b)(2)(A) (2012) (counts 19S, 20S, 22S).

The district court sentenced Robinson to 97 months of imprisonment on counts 1S through 15S to run concurrently with 60 months of imprisonment on counts 16S, 19S, 20S, and 22S, for a total of 97 months of imprisonment. The district court imposed a three-year term of supervised release on counts 1S through counts 16S to run concurrently with a three-year term of supervised release on counts 19S, 20S, and 22S, for a total of three years of supervised release

Robison proceeded on appeal however, the Fifth Circuit Court of Appeals affirmed the sentence and conviction. See, *United States v. Robinson*, 505 F. App'x 385 (5th Cir. 2013). A *pro-se* Title 28 U.S.C. § 2255 and a certificate of appealability.

Robinson filed a Title 18 U.S.C. § 3582 motion alleging that Amendment 792 of the Federal Sentencing Guidelines, revised Application Note 3(a)(ii) in the commentary at guideline § 2B1.1. The revised commentary provides that "intended loss" means "the pecuniary harm that the defendant purposely sought to inflict."

Formerly, the 2010 Guidelines, under which Defendant's advisory Guideline range was determined, defined "intended loss" to mean "the pecuniary harm that was intended to result from the offense."

The District Court denied the motion without an evidentiary hearing under the mistaken theory that Amendment 792 was not retroactive. The Fifth Circuit affirmed and dismissed the appeal as moot since Robinson was released from custody, although Robinson continues to be housed in a federal facility while he resolves his immigration issues.

REASONS FOR GRANTING THE WRIT

THIS COURT SHOULD ISSUE A WRIT OF CERTIORARI BECAUSE THE UNITED STATES COURT OF APPEALS FOR THE SECOND CIRCUIT HAS INTERPRETED A FEDERAL STATUTES IN A WAY THAT CONFLICTS WITH APPLICABLE DECISIONS OF THIS COURT

Supreme Court Rule 10 provides in relevant part as follows:

Rule 10
CONSIDERATIONS GOVERNING REVIEW
ON WRIT OF CERTIORARI

> (1) A review on writ of certiorari is not a matter of right, but of judicial discretion. A petition for a writ of certiorari will be granted only when there are special and important reasons, therefore. The following, while neither controlling nor fully measuring the Court's discretion, indicate the character of reasons that will be considered:
>
> > (a)When a United States court of appeals has rendered a decision in conflict with the decision of another United States Court of Appeals on the same matter; or has decided a federal question in a way in conflict with a state court of last resort; or has so far departed from the accepted and usual course of judicial

proceedings, or sanctioned such a departure by a lower court, as to call for an exercise of this Court's power of supervision.

(b)When a ... United States court of appeals has decided an important question of federal law which has not been but should be, settled by this Court, or has decided a federal question in a way that conflicts with the applicable decision of this Court.... Id.

Id. Supreme Court Rule 10.1(a), (c)

QUESTIONS PRESENTED

I. SHOULD A WRIT OF CERTIORARI BE GRANTED TO DETERMINE WHETHER THE DISTRICT COURT AND THE FIFTH CIRCUIT ERRED IN NOT GRANTING RELIEF UNDER TITLE 18 U.S.C. § 3582

The first step the District Court was required to take in deciding whether to act on Robinson's motion is to determine whether the retroactive amendment lowers his guideline range. In this case, the sentence would have been substantially lower. That step was never addressed nor considered by either court. The court's merely assumed that Title 18 U.S.C. § 3582 would not assist Robinson. In other words, "the Court must substitute the amended guideline range for the originally applied guideline range and determine what sentence it would have imposed. In undertaking the first step, only the amended guideline range has changed. All other guideline application decisions made during the original sentencing remain intact." *United States v. Voutier*, (144 F.3d 756, 760 (11th Cir. 1998).

Applying these instructions, Robinson's guideline range applicable to this case would have required a complete vacatur of the judgment and resentencing.

Specifically, the base offense level of this case was determined by a loss amount that has come into question in light of Amendment 792. Based on Robinson's exemplary conduct and post-conviction rehabilitation, the Court was required to address the entitlement to the sentence reduction consideration, by addressing the determined loss amounts. The Court may consider all pertinent information applying Section 3553(a) factors and in determining whether and by how much to reduce a Defendant's sentence. In particular, the Court must consider the public safety considerations and may consider information regarding the post sentencing conduct of Robinson. See United States Sentencing Guideline Section 1B1.10, comment (again "the Court may consider post sentencing conduct of a defendant that occurred after imposition of the original term of imprisonment...")

The District Court and appellate court overlooked that the amendment as clarifying is applicable retroactive. *Ry. Labor Execs.' Ass'n v. S. Pac. Transp. Co.*, 7 F.3d 902, 909 (9th Cir. 1993) ("Clarifying amendments may only be retroactively applied to direct appeal of a sentence or under a § 2255 motion"). Since amendment 792 is indeed a "clarifying amendment" Armstrong dictates that "clarifying amendments" do apply to Robinson's pleadings. Armstrong was never considered by the District Court.

The District court further confused the issue by incorrectly stating, "USSG §1B1.10(d) lists the amendments that apply retroactively for purposes of a

sentencing reduction under 18 U.S.C. § 3582(c)." Interestingly, Amendment 792 is not included in USSG § 1B1.10. This statement was in error because of USSG §1B1.10(d) and 18 U.S.C. § 3582(c) applies only to "substantive amendments" to the Sentencing Guidelines. Amendment 792, as the court has admitted, is a "clarifying amendment" not a "substantive amendment." Thus the court's argument that Amendment 792 did not apply retroactively fails. As such this Court must agree that the Circuit and District Court erred as a matter of law in not applying the amendment, requiring a remand to the District Court for resentencing by vacating the instant conviction and sentence.

II. DID THE DISTRICT COURT HAVE THE AUTHORITY TO REDUCE ROBINSON'S SENTENCE UNDER TITLE 18 U.S.C. § 3582.

A. The District Court had the Authority to Sentence Robinson to a Reduction Based on the Pecuniary Harm that Robinson Purposely Sought to Inflict

1. Treating Amended 792 as Mandatory Violates Title 18 § U.S.C. 3582(C)(2).

The first problem with the changes to Amendment 792 is that they are designed to limit a court's ability to resentence Robonson in accord with the applicable § 3553(a) factors, thereby requiring the court to violate its obligations under 18 U.S.C. § 3582(c)(2) to "consider the factors set forth in § 3553(a) to the extent that they are applicable" when reducing the sentence. In particular, amended 792 would require the district court to grant, a reduction in every case even if the

resulting sentence would still be greater than necessary to serve the purposes of sentencing or create unwarranted disparity or otherwise contradict an applicable § 3553(a) factor.

2. Treating Amendment 792 as Mandatory Violates this Court's Booker and Kimbrough decisions.

Even if the amendment did resolve the § 3553(a) problems (which it clearly did not), revised loss amount determinations would still violate *Booker*, 543 U.S. 220, 125 S. Ct. 738 insofar as it renders any part of the guidelines mandatory. Booker made clear that the right to have a jury find facts that are essential to the punishment "is implicated whenever a judge seeks to impose a sentence that is not solely based on facts reflected in the jury verdict or admitted by the defendant." Booker, 543 U.S. at 232 (citation and internal punctuation marks omitted) (emphasis added). Many of the defendants who will be resentenced under § 3582(c)(2) were initially sentenced on the basis of facts that were neither found by the jury nor admitted by the defendant. Requiring a court to impose a new sentence based on facts that were initially found in violation of the Sixth Amendment would import that Sixth Amendment violation into the new sentence. Booker also made clear that the guidelines cannot be applied as mandatory in some circumstances and not others. The Court rejected the government's suggestion that it "renders the Guidelines as advisory in any case in which the Constitution prohibits judicial fact-finding" but "leave them as binding in all other cases. . . . [W]e do not see how it

is possible to leave the Guidelines as binding in other cases. For one thing, the Government's proposal would impose mandatory Guidelines-type limits upon a judge's ability to reduce sentences, but it would not impose those limits upon a judge's ability to increase sentences. We do not believe that such one-way levers are compatible with Congress' intent." *Booker*, 543 U.S. at 266 (internal punctuation marks and citation omitted) (emphasis in original). Requiring the guidelines to be treated as advisory in a § 3582(c)(2) re-sentencing does not run afoul of cases holding that Booker is not retroactive. The limitations on giving retroactive effect to new constitutional rules were designed to protect the system's interest in finality. See, e.g., *Teague,* 489 U.S. at 309 ("Application of constitutional rules not in existence at the time a conviction became final seriously undermines the principle of finality which is essential to the operation of our criminal justice system."). In contrast, a § 3582(c)(2) proceeding renders the judgment no longer final for the limited purpose of imposing a reduced sentence. See 18 U.S.C. § 3582(b) ("Notwithstanding the fact that a sentence to imprisonment can subsequently be modified pursuant to the provisions of subsection (c) . . . a judgment of conviction that includes such a sentence constitutes a final judgment for all other purposes") (emphasis added). Put another way, a judgment of conviction does not constitute a final judgment for purposes of modifying the sentence pursuant to 18 U.S.C. § 3582(c)(2) and thus

the finality concerns against applying *Booker* retroactively do not exist in that limited context. See also *United States v. Goines*, 357 F.3d 469, 478 (4th Cir. 2004)("the disruption of finality engendered by a broad interpretation of § 3582(c)(2) is consistent with the legislative design," which anticipates that sentences will be reopened whenever a guideline amendment is given retroactive effect). Nor does permitting those resentenced under § 3582(c)(2) to obtain the benefit of Booker result in disparate treatment vis a vis other inmates who do not have a right to a § 3582(c)(2) re-sentencing.

For example, it could certainly be said that in the case of *United States v. Butler,* 139 Fed. Appx. 510, 512 (4th Cir. 2005) the defendant was fortunate that the district court twice sentenced him incorrectly, thus continuing his case long enough for Booker to be decided before the latest sentence was imposed. But, it is not unusual for temporal happenstance to control whether a criminal defendant receives the benefit of a Supreme Court decision. And, *Butler* is no less "deserving" of benefiting from *Booker* than are any of the other defendants who happened to have been sentenced after Booker was decided. The fact is that when *Butler* was sentenced, *Booke*r had already been decided, and that is all that matters. See, *United States v. Butler*, 139 Fed. Appx. 510, 512 (4th Cir. 2005).

Since January 12, 2005, anytime a defendant receives a new sentence, that sentence must comply with *Booker*. See, e.g., *Gutierrez-Ramirez*, 405 F.3d at 359

n.14 (where the sentence is vacated for error in applying guidelines, the court must correct the error and also apply guidelines as advisory at resentencing); *United States v. Doe*, 398 F.3d 1254, 1261 n.9 (10th Cir. 2005) (on remand for resentencing following error in applying guidelines, the court no longer needs to credit defendant for his assistance under Booker); *Gleich,* 397 F.3d at 615 (remanding the case for resentencing following guideline application error, at which "the district court shall apply the advisory guideline regime").

3. The Revisions to Amendment 792 Violate the Sentencing Commission's Statutory Obligations Under Its Enabling Statute

In revising Amendment 792 to restrict a court's ability to even consider this acknowledged failure of the guideline as amended to satisfy § 3553(a) when imposing a new sentence under § 3582(c)(2), the Commission has violated its obligation under 28 U.S.C. § 994(a)(2) to write policy statements that "further the purposes set forth in section 3553(a)(2)." See, Title 28 U.S.C. § 994(a)(2). It has also violated its obligation to establish sentencing policies and practices that assure that the purposes of § 3553(a)(2) are met, avoid unwarranted sentencing disparities, maintain sufficient flexibility to permit individualized sentences, and reflect advancement in the knowledge of human behavior as it relates to the criminal justice process. Title 28 U.S.C. § 991(b)(1)(A)-(C). If guideline commentary "is at odds with" the plain language of 28 U.S.C. § 994, the guideline commentary "must give way." See, *United States v. LaBonte*, 520 U.S. 751, 757

(1997). The amendments are thus void as an improper exercise of Commission authority, in addition to violating the remedial holding in *United States v. Booker*, 543 U.S. 220, 125 S.Ct. 738, 160 L.Ed.2d 621 (2005) and should be rejected. *Stinson,* 508 U.S. at 44.

To the extent that Amendment 792 purports to interpret § 3582(c)(2), it is also void under *Stinson v. United States*, 508 U.S. 36 (1993), which rejected the notion that policy statements and another commentary should be viewed as construing the statutes the Commission administers. Instead, Stinson v. United States, 508 U.S. 36 (1993) held that "the functional purpose of commentary (of the kind at issue here) is to assist in the interpretation and application of "the guidelines." *Stinson* at 45 In contrast, the clear intent of the proposed revisions Amendment 792 is to cabin and control the judicial interpretation of § 3582(c)(2), which in turn violates the separation of powers principles because it is a judicial function to interpret and apply laws. See *Marbury v. Madison*, 5 U.S. (1 Cranch) 137 (1803) ("It is emphatically the province and duty of the judicial department to say what the law is. Those who apply the rule to particular cases must of necessity expound and interpret that rule. If two laws conflict with each other, the courts must decide on the operation of each.").

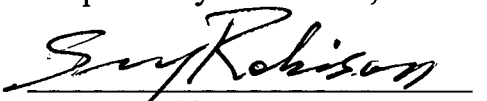
As such, this Court must agree that the Circuit and District Courts erred in not vacating the sentence in the instant matter.

CONCLUSION

Based on the foregoing, this Court should grant this request for a Writ of Certiorari and remand order the Court of Appeals for the Fifth Circuit.

Done this 20th day of November 2018

Respectfully submitted,



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