

APPENDIX

Appendix A

Opinion below

United States v. Perkins, No. 18-2680 (8th Cir.)
(slip op.) (dated September 23, 2019)

United States Court of Appeals
For the Eighth Circuit

No. 18-2680

United States of America

Plaintiff - Appellee

v.

Joseph Thor Perkins

Defendant - Appellant

Appeal from United States District Court
for the District of Minnesota - St. Paul

Submitted: March 15, 2019
Filed: September 23, 2019
[Unpublished]

Before SHEPHERD, ERICKSON, and KOBES, Circuit Judges.

PER CURIAM.

Joseph Thor Perkins pleaded guilty to one count of producing child pornography in violation of 18 U.S.C. § 2251(a). The district court¹ sentenced him to 336 months in prison, a 24-month downward variance from the recommended Guidelines range. In addition to the standard \$100 special assessment, the court

¹ The Honorable Joan N. Erickson, United States District Judge for the District of Minnesota.

imposed a \$5,000 mandatory special assessment pursuant to 18 U.S.C. § 3014. On appeal, Perkins challenges the reasonableness of his sentence and the special assessment. After careful review of the record, we find no abuse of discretion. United States v. Starr, 533 F.3d 985, 1003 (8th Cir. 2008), and we affirm.

I.

Perkins agrees that the district court correctly determined that the Guidelines range for his offense began, and ended, at the statutory maximum of 360 months. Nor does he dispute the sentencing enhancements he received for the victims' ages, his sexual contact with them during the offense, the number of victims, and his past sex offenses. Perkins further acknowledges that the district court granted a 24-month downward variance to credit his guilty plea that spared victims from enduring a trial.

Although the recommended sentence was at the statutory maximum, Perkins claims that the district court procedurally erred by rejecting his request for a sentence at the statutory minimum by failing to meaningfully consider his mitigation argument and explain its reasoning. He also asserts that his sentence is substantively unreasonable because his conduct does not implicate more severe sentencing enhancements, by, for example, involving younger victims, abusing a special relationship, or widely distributing the images.

At sentencing, a district court abuses its discretion if it "fails to consider a relevant factor that should have received significant weight, gives significant weight to an improper or irrelevant factor, or considers only the appropriate factors but commits a clear error of judgment in weighing those factors." United States v. Merrell, 842 F.3d 577, 585 (8th Cir. 2016) (quoting United States v. Watson, 480 F.3d 1175, 1177 (8th Cir. 2007)). The district court "is not required to recite the § 3553(a) factors mechanically or to make specific findings on the record about each factor." Id. at 584 (quotations omitted). Nor does every "argument advanced by a

defendant require[] a specific rejoinder.” United States v. Morris, 918 F.3d 595, 597 (8th Cir. 2019) (quoting United States v. Grey, 533 F.3d 942, 944 (8th Cir. 2008)). A court need only adequately explain the reasons for the sentence to permit appellate review. United States v. Feemster, 572 F.3d 455, 461 (8th Cir. 2009) (en banc).

In reviewing the reasonableness of a sentence, “when the bottom of the guidelines range is [at or] above the statutory maximum, the statutory maximum sentence is presumed reasonable.” United States v. Shafer, 438 F.3d 1225, 1227 (8th Cir. 2006). If the court imposes a sentence below the range suggested by the guidelines, “it is nearly inconceivable that the court abused its discretion in not varying downward still further.” United States v. Worthey, 716 F.3d 1107, 1116 (8th Cir. 2013) (quoting United States v. Spencer, 700 F.3d 317, 322 (8th Cir. 2012)).

The sentencing transcript shows that Perkins’s punishment is grounded in the § 3553(a) factors. It explained that Perkins was convicted of “one of the most serious offenses.” The offense conduct was “not just pornography but actually being a predator to actual children” and that he “disregard[ed] the lives of those children.” The court also considered the need for greater deterrence in light of Perkins’ criminal history because he had continued “to ruin the lives of these children.” Thus, the sentencing colloquy reflects “substantial insight into the reasons for [the court’s] determination” as our precedent requires. Feemster, 572 F.3d at 463 (quoting United States v. Kane, 552 F.3d 748, 756 (8th Cir. 2009)).

We also find no error with the district court’s alleged failure to consider the absence of other, more severe sentencing enhancements. Perkins’s conduct was serious enough. He does not dispute that his conduct merited adding ten additional offense levels and even without accounting for his criminal history, his Guidelines range began and ended with the statutory maximum. This alone is sufficient to reject his request to be sentenced at the statutory minimum. Shafer, 438 F.3d at 1227. The court rejected his primary mitigation argument stating that “[t]reatment may or may not work,” but it was unnecessary to address facts that did not apply.

Perkins also claims that the district court's discussion of his sexual activity with minors shows "the essence of his culpability" is statutory rape, and as such, his punishment should reflect that lesser culpability.² We flatly reject this argument. The plea agreement shows Perkins confessed to producing child pornography "us[ing] his Sony digital camera and Samsung Galaxy cellular telephone to produce hundreds of images and videos of the minor victims engages in sexual acts." On top of that, he "encouraged minors to meet him in person to engage in sexual acts with [him] and so that [he] could photograph the minors engaged in sexually explicit conduct." The district court merely fulfilled its duty to discuss the aggravating factors that supplied the basis for its decision to enhance his sentence. Therefore, we find no error in explaining that Perkins had greater culpability because in addition to producing child pornography he also molested children.

II.

We also hold that the district court did not clearly err by imposing the \$5,000 special assessment. United States v. Kelley, 861 F.3d 790, 801 (8th Cir. 2017). Perkins is correct that only a "non-indigent person" is eligible for the assessment. See 18 U.S.C. § 3014 ("the court shall assess an amount of \$5,000 on any non-indigent person"). When determining a defendant's indigency status under § 3014, a court should consider "both a defendant's current financial situation and his ability to pay in the future." Kelley, 861 F.3d at 801. At sentencing, the court weighed Perkins' ability to pay, noting that half of the assessment could be paid by his prison wages. Although he now asserts that his work history is "modest and spotty, at best," the district court could rely on Perkins touting his "strong work history" and the presentence investigation report's findings on his past wages. Additionally, Perkins bore the burden to prove he could not pay the assessment, a burden no doubt hindered

² Plain error review generally applies because Perkins failed to make this argument to the district court. See United States v. Kay, 717 F.3d 659, 663 (8th Cir. 2013). Because we find the court did not err, he cannot prevail under either the plain or clear error standards.

by his failure to provide a financial disclosure report. United States v. Allmon, 500 F.3d 800, 808 (8th Cir. 2007).

Perkins claims that because the court found he was unable to pay the minimum \$50,000 fine it could not impose the \$5,000 assessment. The district court relied on the presentence investigation report finding that Perkins could not pay a fine within the Guidelines range. Our precedent holds that “[i]t is incorrect for a court to impose a fine that the defendant has little chance of paying.” United States v. Berndt, 86 F.3d 803, 808 (8th Cir. 1996). Although the same indigency standard applies, the amount of the fine is a factor that changes the analysis. We therefore reject Perkins’s argument that his inability to pay a fine ten times larger than the assessment requires finding that he could not pay the assessment.

* * *

Perkins’s sentence and special assessment are affirmed.

Appendix B

Petitioner's sentencing paper
Filed May 14, 2018

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 17-159 (JNE/SER)

UNITED STATES OF AMERICA,)
)
Plaintiff,)
) DEFENDANT'S SENTENCING
v.) POSITION
)
JOSEPH THOR PERKINS,)
)
Defendant.)

Joseph Thor Perkins stands before this Court facing an extremely long sentence.

Mr. Perkin's story is that of a compulsive and life-consuming addiction in the depths of his depression that led to criminal behavior. His advisory imprisonment guideline range is 180 to 360 months. The government urges the court to impose the maximum sentence, thirty years in total. Mr. Perkins, aged thirty-six, is requesting a lesser, though still lengthy sentence of fifteen years' incarceration followed by supervision.

OBJECTION TO THE PSR

The PSR concludes that there should be an eight level enhancement to the base offense level for distribution, sadistic or masochistic conduct, and for the use of a computer. The PSR concludes the final offense level is 50, which is capped at 43. These enhancements were not anticipated in the signed plea agreement. Rather, the parties anticipated a total offense level of 42. Mr. Perkins objects to the enhancements and believes the government will abide with the plea agreement.

SENTENCING ANALYSIS

A. Offense Conduct and Criminal History

As will be discussed below, Mr. Perkins began looking at adult pornography around age 12. At first it was magazines, and then video tapes. He began watching and looking at pornography more and more as he became a teenager. Once when he was caught, his parents yelled at him and he felt shamed. His parents were very religious and sex was not a subject that was discussed in the household. In 1998, his parents had the internet, and Mr. Perkins began to watch more adult pornography in secret. He had depression issues as early as 2005. In 2009, he met his first wife and the couple married in 2011. The marriage did not last long because of Mr. Perkins' porn addiction. When he was confronted by his wife, the couple headed to therapy through the church. It didn't help.

Sometime in July 2013, law enforcement was able conclude that Mr. Perkins was downloading child pornography that involved teen girls. Mr. Perkins was not arrested or charged for two years. After the search warrant was executed on July 31, 2013, Mr. Perkins, for the first time in a long time, stopped viewing pornography. However, he was not treated for his sexual addiction involving teen girls, and a year later, without an arrest, he was back viewing pornography and his behavior escalated.

In August 2014, he met teenager SJB and had sexual contact with SJB. SJB was the subject of a state charge. During the same time period, he met CMM and Mr. Perkins took pictures of CMM. (PSR, ¶ 17). He was charged in state court in February 2015

with offense conduct with SJB. The case was resolved the following year in June 2016. Again, untreated, he was released. In September 2014 and December 2015 Mr. Perkins and JMS had contact (Victim of the two surreptitiously recorded videos in PSR ¶ 9-11). The two had contact again in January 2016 and October 2016. Mr. Perkins and EKS had contact during the same time in October 2016 and again he took pictures of EKS. (PSR ¶ 12-14). Mr. Perkins maintains that he did not have sexual contact with MRA (PSR, ¶ 18-21) in 2013. He does admit he took pictures of MRA in October of 2016 and had contact with her in 2014. At no time did he attempt to “pimp” her on Craig’s list nor did tell her to hold sign that read “I’m Joe’s girl.” He did not penetrate her with his penis. He did not tell her that he fantasied about young boys. In fact, the majority of the child pornography found on his computer is of teenage girls. Again, during this same time period in 2016, on September 23, 2016, he made contact with an undercover officer who was pretending to be a 14-year old teenager. He was arrested on that offense in late October 2016 and has remained in custody since that date. The offense conduct is a pending case in Washington County. It was because of the October 2016 conduct, that police seized the cellular phone Mr. Perkins used to communicate with the undercover officer. Images of teen girls were found on the phone. A search warrant at Mr. Perkins’ home was executed. A laptop and a camera were found to contain child pornography and resulted in the instant case.

This offense involves two videos and photos of teenagers that Mr. Perkins produced that were sexual in nature. But for the two videos, the teens were aware that Mr. Perkins was taking the pictures. Some of the photographs found on Mr. Perkins’

computers were images sent by the teens, some not all, were at Mr. Perkins' request. Mr. Perkins never shared or distributed any of the photos or videos. Mr. Perkins' never threatened any of the teenagers to pose nude. Rather, as evident in the two videos, he asked "are you sure you want to do this."

There is no if what's or buts about this case being serious. The case is serious. Mr. Perkins went from viewing adult pornography to searching for "PTHC" or preteen hardcore pornography. Without any charges and untreated, his behavior escalated to meeting with teenagers and then producing child pornography. Much of the activity listed in the federal indictment occurred in the fall of 2016. Once he made an appearance in Scott County on the Criminal Sexual Conduct charge from August 2014 in June of 2016, he began seeing a Chaplin at the Scott County the Jail. This was the first time he began discussing his addiction. The court ordered a psychological and sexual offender evaluation once Mr. Perkins pled guilty. The recommendation included attending a program for men on sexual offending and pornography addiction, individual therapy, and his internet use be monitored. He was eventually released from custody in May 2017, and before his state probation officer could set up sex offender treatment, he was arrested on a federal complaint. In other words, Mr. Perkins remains untreated and in custody.

B. Mr. Perkins' Background

Mr. Perkins was born in Edina, MN in 1981, to Richard and Renae. He had a younger sister that he got along with, and parents to whom he was "always close." There was no abuse in his home, no domestic violence, nothing to suggest the troubles that lay

ahead for Mr. Perkins. The troubles began when he was child and continued into adulthood and eventually led him to this current incarceration.

1. Mr. Perkin's youth and his addiction

Mr. Perkins moved around a lot in school. Because of this, he was always the “new kid” and found it difficult to make friends. Mr. Perkins was made fun of a lot by the other students; his escapes were playing hockey and baseball, and eventually, in 1998, escaping into the internet. Mr. Perkins learned a lot about the internet, computers, and technology from a young age. Mr. Perkins had already had a collection of porn in video and magazine format, but now used the internet to download porn. At twelve years old Mr. Perkins was first exposed to pornography, and by his late teens he had discovered he could access it on the internet—the beginnings of an addiction that Mr. Perkins would describe as the worst thing that has ever happened to him.

Mr. Perkins grew up in a very Christian household where sex was not talked about, and privacy was important. Mr. Perkins was caught by his parents watching porn. They grounded him and told him that it was wrong. This was the extent of their conversation, as sex and porn were “taboo.” As Mr. Perkins’ entered his teenage years, the dual influences of pornography and budding depression began to affect his life. “When I watched porn I would feel excited,” he told a psychosexual clinician from Scott County¹. “I still struggle with the porn addiction now. I know it is not a good thing to

¹ The Psychosexual Evaluation will be filed separately from this memorandum.

look at, but I'm addicted. . .I feel like I have to do it all the time. It is something that has consumed a half a day for me at times."

Mr. Perkins graduated from Osseo High School in 2000. He did not have good grades to attend college. A year later, he attended Rhema Bible School in Broken Arrow, Oklahoma. He went to Bible School in the hopes of turning things around for himself. However, after a semester, the funding was cut, and Mr. Perkins could no longer attend school. Mr. Perkins bounced from job to job—a bouncer in a night club, selling snowmobile parts, and working at a telephone company. He decided to come back to Minnesota. After arriving in Minnesota, Mr. Perkins' girlfriend cheated on him, and his depression settled in. Mr. Perkins' faith lapsed, and rejected God out of anger with how his life was going. He began working at Costco, a job he held until his arrest in October 2016.

When he was about twenty-three to twenty-four years old, Mr. Perkins felt depressed. He felt "numb," "emotionless," and "didn't care whether he lived or died." Growing up, his parents didn't discuss depression or any other mental health issues. During this time, Mr. Perkins was speeding down the freeway at a dangerous speed talking on the phone to his girlfriend telling her he didn't care if he died. His girlfriend called his pastor John Hammond, and they spoke about Mr. Perkin's feelings.

The depression receded in time. In 2010, Mr. Perkins met K.L.L through his work, and within the year they were married. In April 2012 together they moved to a house in Lakeville, Minnesota. Mr. Perkins continued to work as a forklift driver for Costco, but all the while Mr. Perkins struggled with his addiction to pornography. His interests began

to tend down towards teenage girls, thinking that if it looked as if no one was forcing them, it was all right. K.L.L. found teen porn on Mr. Perkins' computer, and Mr. Perkins began having trouble in his marriage.

K.L.L. advised Mr. Perkins to seek counseling and so in Fall 2012, Mr. Perkins sought treatment for pornography addiction after years of addiction. The counselor that he sought help from later would be suspended from her position. "I don't like looking at porn but it draws me in," Mr. Perkins would write. (Psychosexual Evaluation). Depression and boredom began to be drivers of his use of pornography, consuming entire days, and rather than getting the help he needed from the disbarred counselor, Mr. Perkins instead attempted to break into the field of photography.

Maybe unsurprisingly, Mr. Perkins' marriage began to fail. K.L.L left him, and a week later was living with her old boyfriend. "In 2013 after my divorce I was in a dark place," Mr. Perkins said, describing downloading a large batch of pornography over a peer-to-peer file sharing network. "Some of it was child porn. I felt extremely guilty. . . had not intentionally looked at child porn before that." (Psychosexual Evaluation p. 7, 10). Mr. Perkins said he felt excitement and attention when he engaged with the teens. After his divorce, Mr. Perkins felt numb, "not having any feelings," as he did during his period of depression in his mid-twenties. Talking to the teens "sparked a feeling" that he then sought out. Up to this moment, Mr. Perkins had no criminal history, and after 2013, Mr. Perkins' life went downhill.

2. The downward spiral

Mr. Perkins felt guilt over the child pornography. (Psychosexual Evaluation p. 7). He now recognizes that viewing the videos furthers the market. In June 2014, Mr. Perkins moved to a house located in Shakopee, Minnesota. Viewing child pornography on a computer turned into reality. Mr. Perkins pled guilty to criminal sexual contact with an underage individual in August 2014, and in June 2016 was committed to psychosexual treatment. Over August 2016, Mr. Perkins was interviewed by clinicians and took a battery of tests at the Scott County Mental Health Center. Mr. Perkins was diagnosed with adjustment disorder with depressed mood and pornography addiction. (Psychosexual Evaluation p. 17). The clinicians recommended that Mr. Perkins' use of social media and the internet be monitored, until he could complete a class for men struggling with pornography addiction. (Psychosexual Evaluation p. 18). He was found to be moderate-low risk to be convicted of a sex offense or violent crime in the future. It recommended he attend sex offender treatment.

This was never done. Mr. Perkins had been speaking to a probation officer so he could start outpatient treatment in Sherburne County rather than Scott County. On the very same day that he was supposed to go to Sherburne County and meet with his new probation officer, Mr. Perkins was arrested once more on this case.

At the time of committing his first criminal offense, Mr. Perkins was thirty-one years old. Since 2013, he has gone down a dark path which has left his family shocked and his life irrevocably altered. The offense occurred in the depths of Mr. Perkins' addiction, loneliness and depression, a downward spiral following his divorce.

Mr. Perkins had no criminal record before this downward spiral, and has never served a day in prison before this, but now he faces a long sentence and the prospect of reintegrating into society afterwards. The psychosexual evaluation performed by Scott County offers hope. Mr. Perkins took the STATIC-99 test which determines likelihood of re-offending, and was found to be a “moderate-low risk.” (Psychosexual Evaluation p. 17). During his clinical exam, Mr. Perkins also took the HARE PCL-R:2 test for psychopathy, and was found to have a raw score far, far below that of a clinical psychopath. (*Id.*). To reintegrate properly, Mr. Perkins needs treatment, and he needs sponsors. The record shows that without structure, Mr. Perkins’ life falls apart. Mr. Perkins wants to learn how this pattern began, and how he can cope with it.

The Bureau of Prisons has numerous programs for sex offenders that have been found to be highly efficient at reducing the rate of recidivism after release.² Mr. Perkins qualifies for and will have access to individualized treatment ranging from adverse conditioning to drug treatment to therapy, as well as transition services for reentry into society. “The Bureau is committed to providing evidence-based psychology treatment programs to sexual offenders,” the BOP advises. “Sex offender treatment programs, like all Bureau psychology treatment programs, are designed on the most recent research and evidence-based practices, ensuring effective treatment programs.” In-prison therapy coupled with a support system, healthy adult relationships, awareness of his own triggers

² U.S. Bureau of Prisons, “Sex Offender Programs,” February 15, 2013, retrieved from https://www.bop.gov/policy/progstat/5324_010.pdf.

regarding his pornography addiction, and awareness of the harm that are caused to young victims whose own sexualities are developing.

Mr. Perkins lost control of his life, and lost control over his behavior. He exists in a culture with easy access to pornography over the internet, even illegal pornography, and a culture that encourages the eroticization and exploitations of young bodies in media and advertisement. Mr. Perkins is not an obligate pedophile, but rather an opportunist, taking his chances for illegal and indiscriminate connections with teenagers while still maintaining relationships with adult women. Mr. Perkins does not want this lifestyle, and wants to remain law-abiding after his release from prison. Mr. Perkins will consent to any treatment to help him battle his addiction and never put his victims or himself through this ordeal again. Courts have held that “[t]he status of being addicted has an ambiguous relationship to the defendant’s culpability. It could be a mitigating factor, explaining the motivation for the crime. It could be an aggravating factor, supporting a finding of likely recidivism. . .If drug addiction creates a propensity to crime, drug rehabilitation goes a long way to preventing recidivism.” *United States v. Perella*, 273 F. Supp. 2d 162, 164 (D. Mass. 2003) (Gertner, J.)

Through his mother and his pastor from Living Word Christian Center in Brooklyn Park, Mr. Perkins has rededicated his life to Christ since being in custody, and wants to live his life in accordance with the Bible. Through the help and programs that will be provided to him at the BOP, Mr. Perkins wants to combat this addiction, and prevent future recidivism before the seeds of it can even begin to grow. Since being at the Sherburne County Jail, he has not been able to receive professional help for his

addiction. However, he has attended weekly bible study and has had one on one meetings with a minister. Defense Exhibit 1 is a list of books Mr. Perkins has read to keep himself focused on bettering himself. He has influenced other inmates to stay out of trouble and focus on bettering themselves. In a letter to the Court, Mr. Perkins explains his studies at the jail. Many defendants find religion while in jail. However, religion has played a big part of Mr. Perkins' life. Since being in custody, he knew he needed to "treat" himself for his criminal behavior and start the steps to understanding his behavior. Again, because there is no programming available, Mr. Perkins has done the next best thing and has really involved himself in bible study. The following is an excerpt from a letter that Mr. Perkins received from a prior inmate

loose FAITH! YOUR A GREAT MAN! BE THAT MAN!
Quit letting the enemy put doubt in you! You
Stronger than that brother! YOUR A LEADER Bro...
So do what great leaders do! Dont And guess
damn it!! Run with it. You Smart enough
to get it. GOD CHOOSE YOU 4 A REASON,
Dont Ever Question that. Just Run
WITH IT. I LOOK forward to Seeing you
Again my friend & my brother in Christ.

P.S. Many people Are proud of you
& I'm proud I got the chance
to know you! your Buddy

C. Respect for the law, just punishment and adequate deterrence

A fifteen-year sentence would maintain respect for the law. Fifteen years shows that the government takes abuse of children seriously and provides enough time for Mr. Perkins to be away from society and benefit from in-custody sexual and mental health treatment. Given his history—including the role of addiction in this offense, lack of violence, his age, his lack of prior record—makes a sentence below the guidelines just punishment. As to specific deterrence, fifteen years is sufficient because it combines punitive deterrence with the corrective deterrence that intensive supervised release will provide. Mr. Perkins did not feel deterred by the possible state charges, as he was not arrested and charged right away. In his own words, “The fear eventually went away. It was so long between the arrests, I guess I got comfortable, and the fear wasn’t there anymore.” A sentence of fifteen years in federal prison sends a signal to the greater public that child pornography offenses will be punished with a significant prison sentence.

D. Public Safety

Fifteen years’ incarceration is sufficient to protect the public from Mr. Perkins. In that time, he will be off the streets and getting help for his pornography addiction and mental health issues. Mr. Perkins does not want to recreate his old life and go through all of this again, and he is committed to changing his life. Should Mr. Perkins’ receive a fifteen years sentence, Mr. Perkins will be in his fifties when he is released from prison. Statistics show that older individuals are less likely to commit crimes and less likely to reoffend. Mr. Perkins is qualified to receive treatment in prison that will provide him with

tools he need to cope with his triggers, and will receive treatment *after* prison. Mr. Perkins will indeed be on a lifetime of supervision after his release from prison, where the government can monitor his physical presence via GPS, monitor his computer and phones, and any other technology that has arisen in the meantime. Mr. Perkins is committed to going through any and all BOP programs to reduce his likelihood of reoffending and understanding and coping with his addictions – which according to the psychosexual evaluation, he has a low likelihood of reoffending.

E. Fine and Special Assessment

Mr. Perkins does not have the ability to pay a fine and requests that a fine not be imposed. Pursuant to 18 U.S.C. § 3014, the Court should impose a \$5000 special assessment under the Justice for Victims of Trafficking Act of 2015 on any *non-indigent* person. As stated in the PSR, Mr. Perkins does not have the ability to pay a fine within the fine range. He has been appointed an assistant federal defender because he is indigent. As such, he does not have the ability to pay the \$5000 special assessment.

CONCLUSION

Mr. Perkins is currently at the Sherburne County Jail, planning to serve his time in the most constructive way possible to maximize the treatment he receives in prison.

Mr. Perkins is neither a psychopath nor a dedicated pedophile. Mr. Perkins is a man about to embark on his first prison sentence of his life, which no matter the way the sentencing falls out, will be a lengthy one. Respectfully, he requests that the Court to temper justice with the recognition that the capacity of a person to reform themselves with the assistance of the psychological and correctional professionals that Mr. Perkins

will be surrounded by for the coming years. There is hope for Mr. Perkins, and this hope merits a sentence of fifteen years' incarceration followed by strict supervision.

Dated: May 9, 2018

Respectfully submitted,

s/ Manny K. Atwal

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BOOKS READ BY JOSEPH PERKINS WHILE IN JAIL FROM 11/1/2016 TO 3/2018

Non-Fiction

1. The Bible (from Genesis to Revelation) NLT Translation
2. The Bible (from Genesis to Revelation) Amplified Translation
3. Continues to read and study the Bible daily.****
4. Prison to Praise – Merlin Crothers
5. Power of Praise – Merlin Crothers
6. Grace on Tap – Eric Dykstra
7. See Christmas this Christmas – Eric Dykstra
8. Destined to Reign - Joseph Prince
9. The Power of Right Believing – Joseph Prince
10. No Easy Jesus – Jason Mitchell
11. The Rapture: In a Twinkling of an Eye – Tim LaHaye
12. Grace is Greater – Kyle Idleman
13. The End of Me – Kyle Idleman
14. Gods at War – Kyle Idleman
15. Aha – Kyle Idleman
16. Not a Fan – Kyle Idleman
17. When You, Then God – Rusty George
18. Let God Fight Your Battles – Joyce Meyer
19. Battlefield of the Mind – Joyce Meyer
20. Breaking Bad Habits/Making Good Ones – Joyce Meyer
21. Street God – Dimas Selaberrios
22. The Books of Enoch – Joseph Lumpkin
23. Prophets & Kings – Ellen White
24. Patriarchs & Prophets – Ellen White
25. Revelation Expounded – Dake
26. Know Your Bible
27. How to Study the Bible
28. Arm & Arm With the Holy Spirit – Patrick Day
29. Facing Your Giants – Max Lucado
30. God Will Use This For Good – Max Lucado
31. When Christ Comes – Max Lucado
32. Grace – Max Lucado
33. Trusting God Even When It Hurts – Max Lucado
34. Traveling Light – Max Lucado
35. You'll Get Through This – Max Lucado
36. Play With Fire – Bianca Juarez Olhoff
37. Revelation Unveiled – Tim LaHaye
38. Mere Christianity – C.S. Lewis

- 39. Bondage Breaker – Neil Anderson
- 40. The Case For Christ – Lee Strobel
- 41. The Case for Faith – Lee Strobel
- 42. It's Not What You Think – Jefferson Bethke
- 43. Finding God in the Hard Times – Matt & Beth Redman
- 44. God Loves You – Dr. David Jeremiah
- 45. Cold Case Christianity – J. Warner Wallace
- 46. Driven By Eternity – John Bevere
- 47.

Fiction

- 48. Left Behind – Tim LaHaye and Jerry Jenkins
- 49. Tribulation Force - Tim LaHaye and Jerry Jenkins
- 50. Nicolae - Tim LaHaye and Jerry Jenkins
- 51. Soul Harvest - Tim LaHaye and Jerry Jenkins
- 52. Apollyon - Tim LaHaye and Jerry Jenkins
- 53. Assassins – Tim LaHaye and Jerry Jenkins
- 54. The Indwelling - Tim LaHaye and Jerry Jenkins
- 55. The Mark - Tim LaHaye and Jerry Jenkins
- 56. Desecration - Tim LaHaye and Jerry Jenkins
- 57. The Remnant - Tim LaHaye and Jerry Jenkins
- 58. Armeggedon - Tim LaHaye and Jerry Jenkins
- 59. Glorious Appearing - Tim LaHaye and Jerry Jenkins
- 60. The Rising - Tim LaHaye and Jerry Jenkins
- 61. The Regime - Tim LaHaye and Jerry Jenkins
- 62. Kingdom Come – The Final Victory - Tim LaHaye and Jerry Jenkins
- 63. The Shack – William P. Young
- 64. The Heavenly Man – Paul Hattaway
- 65. End of State (Left Behind Political) – Neesa Hart
- 66. Impeachable Offence (Left Behind Political) Neesa Hart
- 67. Necessary Evils (Left Behind Political) Neesa Hart
- 68. Apocalypse Burning (Left Behind Military) Mel Odom
- 69. Apocalypse Crucible (Left Behind Military) Mel Odom
- 70. Apocalypse Dawn (Left Behind Military) Mel Odom
- 71. Apocalypse Unleashed (Left Behind Miliary) Mel Odom
- 72. Intervention – Terri Blackstock
- 73. Downfall – Terri Blackstock
- 74. Vicious Cycle – Terri Blackstock
- 75. Private Justice – Terri Blackstock

76. If I Run – Terri Blackstock
77. If I'm Found – Terri Blackstock
78. If I Live – Terri Blackstock
79. Cape Refuge – Terri Blackstock
80. Southern Storm – Terri Blackstock
81. River's Edge – Terri Blackstock
82. Breaker's Reef – Terri Blackstock
83. Night Light – Terri Blackstock
84. True Light – Terri Blackstock
85. Dawn's Light – Terri Blackstock
86. Last Light – Terri Blackstock
87. Shadow of Doubt – Terri Blackstock
88. Word of Honor – Terri Blackstock
89. Trial By Fire – Terri Blackstock
90. Truth Stained Lies – Terri Blackstock
91. Distortion – Terri Blackstock
92. Twisted Innocence – Terri Blackstock
93. Shadowed – Jerry Jenkins
94. Silenced – Jerry Jenkins
95. Soon – Jerry Jenkins
96. The Last Operative – Jerry Jenkins
97. The Brotherhood – Jerry Jenkins
98. The Betrayal – Jerry Jenkins
99. The Breakthrough – Jerry Jenkins
100. The Valley of the Dry Bones – Jerry Jenkins
101. Edge of Apocalypse – Tim LaHaye & Craig Parshall
102. Thunder of Heaven – Tim LaHaye & Craig Parshall
103. Mark of Evil – Tim LaHaye & Craig Parshall
104. Brink of Chaos – Tim LaHaye & Craig Parshall
105. American Meltdown – Mark Goodwin
106. American Exit Strategy – Mark Goodwin
107. American Reset – Mark Goodwin
108. Behold Darkness & Sorrow – Mark Goodwin
109. Ichabod – Mark Goodwin
110. A Haunt for Jackals – Mark Goodwin
111. Vengence – Mark Goodwin
112. The Days of Noah – Conspiracy – Mark Goodwin
113. The Days of Noah – Persecution – Mark Goodwin
114. The Days of Noah – Perdition – Mark Goodwin
115. The Days of Elijah – Apocalypse – Mark Goodwin
116. The Days of Elijah – Wormwood – Mark Goodwin

- 117. The Days of Elijah – Angel of the Abyss – Mark Goodwin
- 118. The Pilgrims Progress – John Bunyan
- 119. Times of Turmoil – Cliff Ball
- 120. Times of Trouble – Cliff Ball
- 121. The Last Jihad – Joel Rosenberg
- 122. The Last Days – Joel Rosenberg
- 123. The Ezekiel Option – Joel Rosenberg
- 124. The Copper Scroll – Joel Rosenberg
- 125. Dead Heat – Joel Rosenberg
- 126. The Third Target – Joel Rosenberg
- 127. Without Warning – Joel Rosenberg
- 128. The First Hostage – Joel Rosenberg
- 129. The Twelfth Iman – Joel Rosenberg
- 130. The Shematah -Jonathan Cahn
- 131. Touching Spirit Bear -Ben Mikaelson
- 132. Code to Zero – Ken Follett
- 133. Osterman Weekend – Robert Ludlum
- 134. Prometheus Deception – Robert Ludlum
- 135. Janus Reprised – Robert Ludlum
- 136. Jansen Directive – Robert Ludlum
- 137. Matarese Countdown – Robert Ludlum
- 138. The Paris Option – Robert Ludlum
- 139. Cassandra Compact – Robert Ludlum
- 140. The Shadows of Power – James W. Huston
- 141. A.D. Chronicles – First Light – Bodie Thoene
- 142. A.D. Chronicles – Second Touch – Bodie Thoene
- 143. A.D. Chronicles – Third Watch – Bodie Thoene
- 144. A.D. Chronicles – Fourth Dawn – Bodie Thoene
- 145. A.D. Chronicles – Fifth Seal - Bodie Thoene
- 146. A.D. Chronicles – Sixth Covenant - Bodie Thoene
- 147. The Templars – Michael Haag

Joe has read other books, that we cannot remember, but here is the list so far. I, his mom, order him 2-3 books every week. I also send him copies of crossword puzzles, which he works on. And he has sent in for some correspondence Bible studies and is planning on doing some courses through the mail.

