No. 20-8316

IN THE SUPREME COURT OF THE UNITED STATES

MICHAEL LAWRENCE WILLIAMS, PETITIONER

v.

UNITED STATES OF AMERICA

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

BRIEF FOR THE UNITED STATES IN OPPOSITION

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QUESTION PRESENTED

Whether the substantive-reasonableness review applicable to an appeal of a plenary sentencing under United States v. Booker, 543 U.S. 220 (2005), is required for a district court's denial of a sentence-reduction motion under Section 404 of the First Step Act of 2018, Pub. L. No. 115-391, 132 Stat. 5194.

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OPINIONS BELOW

The opinion of the court of appeals (Pet. App. B2-B3)* is not published in the Federal Reporter but is reprinted at 832 Fed. Appx. 924. The order of the district court (Pet. App. B1) is unreported.

JURISDICTION

The judgment of the court of appeals was entered on January 11, 2021. By orders dated March 19, 2020, and July 19, 2021, this Court extended the time within which to file any petition for a

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* The appendices to the petition for a writ of certiorari are not consecutively paginated. This brief treats the appendices as if they were paginated, with the first page of each as page 1.

writ of certiorari due on or after March 19, 2020, to 150 days from the date of the lower-court judgment, order denying discretionary review, or order denying a timely petition for rehearing, as long as that judgment or order was issued before July 19, 2021. The petition for a writ of certiorari was filed on June 10, 2021. The jurisdiction of this Court is invoked under 28 U.S.C. 1254(1).

STATEMENT

Following a guilty plea in the United States District Court for the Northern District of Texas, petitioner was convicted of possessing with intent to distribute 50 grams or more of cocaine base (crack cocaine), in violation of 21 U.S.C. 841(a)(1) and 21 U.S.C. 841(b)(1)(A)(iii) (2006). Judgment 1. The district court sentenced him to 235 months of imprisonment, to be followed by five years of supervised release. Judgment 2-3. Petitioner did not appeal. Following the enactment of the First Step Act of 2018 (First Step Act), Pub. L. No. 115-391, 132 Stat. 5194, petitioner moved for a sentence reduction under Section 404 of that Act. C.A. ROA 211-219. The district court denied the motion, Pet. App. B1, and the court of appeals affirmed, id. at B2-B3.

1. Petitioner bought and sold powder and crack cocaine in Lubbock, Texas. Plea Agreement 10-12. On three occasions in January and February 2006, petitioner sold crack cocaine to confidential informants in the amounts of approximately 24 grams, 53 grams, and 6 grams. Presentence Investigation Report (PSR)

¶¶ 13-15. Shortly thereafter, police officers searched petitioner's house, pursuant to a warrant, and discovered an additional approximately 99 grams of crack cocaine, along with other drugs, drug paraphernalia, $6580 in cash, and firearms. Plea Agreement 11; see PSR ¶¶ 16-17.

A federal grand jury in the Northern District of Texas charged petitioner with possessing with intent to distribute 50 grams or more of crack cocaine, in violation of 21 U.S.C. 841(a)(1) and 21 U.S.C. 841(b)(1)(A)(iii) (2006); possessing a firearm in furtherance of a drug-trafficking crime, in violation of 18 U.S.C. 924(c) and 2; and possessing a firearm as a felon, in violation of 18 U.S.C. 922(g)(1) and 2. Indictment 1-3. Petitioner pleaded guilty to the drug-distribution count pursuant to a plea agreement in which the government agreed to dismiss the other counts. Plea Agreement 1-12. Petitioner stipulated that the drug-distribution offense involved at least 50 but less than 150 grams of crack cocaine. Id. at 2.

Before sentencing, the Probation Office determined that petitioner was actually responsible for 183.23 grams of crack cocaine, resulting in a base offense level of 34. PSR ¶¶ 19, 25. Its presentence report also assigned petitioner a two-level enhancement for possession of a dangerous weapon and a three-level credit for acceptance of responsibility. PSR ¶¶ 26, 30; see Sentencing Guidelines § 2D1.1(b)(1) (2005); id. § 3E1.1(a) and (b). The Probation Office calculated a criminal history score of

14, resulting in a criminal history category of VI. PSR ¶ 47; see PSR ¶¶ 32-47. Those calculations resulted in an advisory sentencing range of 235 to 293 months. PSR ¶ 71.

Notwithstanding the presentence report's findings, both the government and petitioner maintained at sentencing that, pursuant to the plea agreement, petitioner should be held accountable for only 50 to 150 grams of crack cocaine, which under the 2005 Sentencing Guidelines would have lowered petitioner's base offense level to 32, his total offense level to 31, and his advisory sentencing range to 188 to 235 months. Sent. Tr. 2-3; see Sentencing Guidelines § 2D1.1(c)(4) (2005). The government alternatively suggested that, if the court adopted the presentence report's findings and calculations, the court should impose a sentence of 235 months of imprisonment, at the low end of the guidelines range calculated by the Probation Office. Sent. Tr. 3. The court adopted the presentence report's findings and calculations, id. at 2, and sentenced petitioner to 235 months of imprisonment, to be followed by five years of supervised release. Id. at 4. The court found that the sentence would "adequately address the sentencing objectives of punishment and deterrence, as well as those other factors as set forth in [18 U.S.C.] 3553(a)." Id. at 5. "Of particular significance," the court observed, was petitioner's "extensive criminal history." Ibid. Petitioner did not appeal.

2. a. In the Fair Sentencing Act of 2010 (Fair Sentencing Act), Pub. L. No. 111-220, 124 Stat. 2372, Congress altered the statutory penalties for certain crack-cocaine offenses. Before those amendments, a defendant convicted of trafficking 50 grams or more of crack cocaine, without an enhancement for a resulting death or serious bodily injury, faced a minimum term of imprisonment of ten years, a maximum term of imprisonment of life, and a minimum supervised-release term of five years. 21 U.S.C. 841(b)(1)(A)(iii) (2006). A defendant convicted of trafficking five grams or more of crack cocaine, without an enhancement for a resulting death or serious bodily injury, faced a minimum term of imprisonment of five years, a maximum term of imprisonment of 40 years, and a minimum supervised-release term of four years. 21 U.S.C. 841(b)(1)(B)(iii) (2006). For powder-cocaine offenses, Congress had set the threshold amounts necessary to trigger the same penalties significantly higher. 21 U.S.C. 841(b)(1)(A)(ii) and (B)(ii) (2006) and 21 U.S.C. 846.

The Fair Sentencing Act reduced that disparity in the treatment of crack and powder cocaine by increasing the amount of crack cocaine necessary to trigger the penalties described above. Specifically, Section 2(a) of the Fair Sentencing Act increased the threshold quantities of crack cocaine necessary to trigger the statutory penalties set forth in 21 U.S.C. 841(b)(1)(A) from 50 grams to 280 grams, and in 21 U.S.C. 841(b)(1)(B) from five grams to 28 grams. 124 Stat. 2372. Those changes applied only to

offenses for which a defendant was sentenced after the Fair Sentencing Act's effective date (August 3, 2010). See Dorsey v. United States, 567 U.S. 260, 273 (2012).

b. Under the Sentencing Guidelines, the base offense level for controlled-substance offenses varies depending on the type and amount of substance involved. In 2008, 2011, and 2014, the Sentencing Commission promulgated amendments to the Guidelines that retroactively reduced the base offense level for offenses involving crack cocaine. See Sentencing Guidelines App. C Supp., Amend. 706 (Mar. 3, 2008); id. Amend. 750 (Nov. 1, 2011); id. Amend. 782 (Nov. 1, 2014). After each amendment, petitioner filed a motion to reduce his sentence under 18 U.S.C. 3582(c)(2), which permits a district court to reduce a previously imposed term of imprisonment if the term was "based on a sentencing range that has subsequently been lowered by the Sentencing Commission." 18 U.S.C. 3582(c)(2). On each occasion, the district court calculated the amended guidelines range, reconsidered the Section 3553(a) sentencing factors, and determined that petitioner's sentence remained appropriate. D. Ct. Docs. 32 (May 12, 2008), 52 (Dec. 28, 2011), 60 (Mar. 18, 2016).

c. In 2018, Congress enacted Section 404 of the First Step Act, which allows a defendant sentenced for a "covered offense," defined in Section 404(a) as "a violation of a Federal criminal statute, the statutory penalties for which were modified by section 2 or 3 of the Fair Sentencing Act * * * , that was committed

before August 3, 2010," to seek a reduced sentence. 132 Stat. 5222. Under Section 404(b), a district court that "imposed a sentence for a covered offense may, on motion of the defendant, * * * impose a reduced sentence as if sections 2 and 3 of the Fair Sentencing Act * * * were in effect at the time the covered offense was committed." 132 Stat. 5222. Section 404(c), in turn, provides that Section 404 "shall [not] be construed to require a court to reduce any sentence," and prohibits a court from reducing a sentence under Section 404 "if the sentence was previously imposed or previously reduced in accordance with the amendments made by sections 2 and 3 of the Fair Sentencing Act * * * or if a previous motion made under [Section 404] to reduce the sentence was, after the date of enactment of [the First Step Act], denied after a complete review of the motion on the merits." Ibid.

3. In 2019, petitioner moved for a sentence reduction under Section 404. C.A. ROA 211-219. Petitioner contended that his conviction was for a covered offense and that he should receive a sentence reduction in light of the intervening statutory and guideline changes. Id. at 213-218. The government agreed that petitioner was eligible for a sentence reduction under Section 404 because, after the Fair Sentencing Act, his offense would no longer trigger the penalties prescribed in 21 U.S.C. 841(b)(1)(A)(iii), but would instead be subject to lesser penalties in Section 841(b)(1)(B)(iii). Id. at 230-231. But the government recommended

that the court exercise its discretion not to reduce petitioner's sentence in light of his "long, consistent and severe criminal history," including his "long history of aggravated assaults," his "possession and distribution of drugs," and his possession of a firearm after his felony convictions. Id. at 231.

The district court denied petitioner's motion. Pet. App. B1. The court recognized that petitioner was eligible for a sentence reduction, but after considering the sentencing factors in 18 U.S.C. 3553(a), including petitioner's "criminal history, public safety issues, offense conduct or relevant conduct, and the post-sentencing conduct," the court declined to reduce petitioner's term of imprisonment. Ibid.

4. On appeal, petitioner argued, as relevant here, that the district court's "re-imposition of a 235-month sentence -- the same sentence imposed 14 years ago -- was substantively unreasonable" in light of the Sentencing Commission's intervening amendments to the Sentencing Guidelines. Pet. C.A. Br. 17. Petitioner acknowledged, however, that his argument was foreclosed by United States v. Batiste, 980 F.3d 466 (2020), in which the Fifth Circuit had explained that "the bifurcated procedural soundness and substantive reasonableness review of sentencing decisions that is derived from United States v. Booker, 543 U.S. 220 (2005), and its progeny, is inapplicable" to Section 404 motions. Id. at 479-480. Relying on Batiste and petitioner's

acknowledgement that it foreclosed his argument, the court of appeals summarily affirmed. Pet. App. B2-B3.

ARGUMENT

Petitioner contends (Pet. 9-13) that the court of appeals erred by not reviewing the district court's denial of his Section 404 sentence reduction motion for substantive reasonableness. The court of appeals' decision is correct, and its unpublished and nonprecedential affirmance does not implicate a circuit conflict that warrants this Court's consideration. Moreover, even if the question presented warranted review, this case would be an unsuitable vehicle because the district court reasonably declined to reduce petitioner's sentence. The petition for a writ of certiorari should be denied.

1. The court of appeals correctly held that denials of Section 404 relief are not subject to substantive reasonableness review under this Court's decision in United States v. Booker, 543 U.S. 220 (2005).

"'A judgment of conviction that includes a sentence of imprisonment constitutes a final judgment' and may not be modified by a district court except in limited circumstances." Dillon v. United States, 560 U.S. 817, 824 (2010) (quoting 18 U.S.C. 3582(b)) (brackets omitted); see 18 U.S.C. 3582(c). Section 3582(c)(1)(B) creates an exception to that general rule of finality by authorizing a court to modify a previously imposed term of imprisonment "to the extent otherwise expressly permitted by

statute." 18 U.S.C. 3582(c)(1)(B). Section 404 of the First Step Act, which expressly provides that a court "may" reduce a previously imposed sentence in certain circumstances, § 404(b), 132 Stat. 5222, is such a statute. But its express authorization is narrowly drawn, permitting the district court only to "impose a reduced sentence" for defendants previously sentenced for a "covered offense" and only "as if sections 2 and 3 of the Fair Sentencing Act * * * were in effect at the time the covered offense was committed." Ibid. Section 404 does not expressly authorize other changes to a sentence for a covered offense. And Section 404 further makes clear that it "shall [not] be construed to require a court to reduce any sentence." § 404(c), 132 Stat. 5222.

Every court of appeals to consider the question has accordingly recognized that Section 404 does not create any entitlement to a plenary resentencing. See United States v. Concepcion, 991 F.3d 279, 289-290 (1st Cir. 2021), petition for cert. pending, No. 20-1650 (filed June 25, 2021); United States v. Moore, 975 F.3d 84, 90 (2d Cir. 2020); United States v. Easter, 975 F.3d 318, 326 (3d Cir. 2020); United States v. Wirsing, 943 F.3d 175, 181 & n.1 (4th Cir. 2019); United States v. Hegwood, 934 F.3d 414, 415 (5th Cir.), cert. denied, 140 S. Ct. 285 (2019); United States v. Smith, 958 F.3d 494, 498 (6th Cir.), cert. denied, 141 S. Ct. 907 (2020); United States v. Kelley, 962 F.3d 470, 475-476 (9th Cir. 2020), cert. denied, No. 20-7474 (June 28, 2021);

United States v. Brown, 974 F.3d 1137, 1144 (10th Cir. 2020); United States v. Denson, 963 F.3d 1080, 1089 (11th Cir. 2020); see also United States v. Brewer, 836 Fed. Appx. 468, 468-469 (8th Cir. 2021) (per curiam). Rather, Section 404 grants district courts discretion to grant or deny a limited modification of an existing sentence. And in keeping with Section 404's limited scope, the court of appeals below correctly determined that a district court's decision whether to grant that limited relief is not subject to the reasonableness review that this Court's decision in Booker requires for plenary sentencing proceedings. Pet. App. B3.

That determination is reinforced by this Court's consideration of the closely analogous sentence-reduction proceedings under 18 U.S.C. 3582(c). Section 3582(c)(2) permits a sentence reduction for a defendant "sentenced to a term of imprisonment based on a sentencing range that has subsequently been lowered by the Sentencing Commission." 18 U.S.C. 3582(c)(2). In Dillon v. United States, supra, this Court explained that, like Section 404, Section 3582(c)(2) "authorize[s] only a limited adjustment to an otherwise final sentence and not a plenary resentencing proceeding." 560 U.S. at 826. The Court stressed that Section 3582(c)(2) allows district courts only to "'reduce'" sentences for a "limited class of prisoners" under specified circumstances. Id. at 825-826 (citation omitted). And the Court concluded that, "[g]iven the limited scope and purpose of" Section

3583(c)(2), "proceedings under that section do not implicate the interests identified in Booker" or "the remedial aspect of the Court's decision." Id. at 828-829.

The same logic applies to Section 404. Analogously to Dillon, Section 404(b) permits a district court only to impose a "reduced sentence," and only for a limited set of prisoners -- namely, those serving a sentence for a "covered offense" who are not excluded by Section 404(c). First Step Act § 404(b), 132 Stat. 5222. Analogously to Dillon, the district court may exercise discretion to reduce a sentence "only at the second step of [a] circumscribed inquiry," 560 U.S. at 827, in which it first determines eligibility for a reduction and thereafter the extent (if any) of such a reduction, see First Step Act § 404(b) and (c), 132 Stat. 5222. And analogously to Dillon, Section 404(b) affords defendants an opportunity to seek retroactive relief that is "not constitutionally compelled." 560 U.S. at 828.

Contrary to petitioner's contention (Pet. 12), Section 404(c)'s limitations on the circumstances in which district courts may consider Section 404 motions on the merits do not suggest that Booker governs appellate review of the denial of such a motion. Section 404(c)'s prohibition on entertaining a successive Section 404 motion if a previous motion was "denied after a complete review of the motion on the merits," First Step Act § 404(c), 132 Stat. 5222, merely "bars repetitive litigation" and does not describe what "a complete review" entails. Moore, 975 F.3d at 91. It "does

not require that any particular procedures be followed during that review," ibid., much less speak to the standard by which an appellate court should review such a decision. See ibid. ("[I]t would be strange for Congress to have obliquely slipped a standard for adjudicating First Step Act motions into a provision that bars repetitive litigation.").

The remainder of Section 404's text, "together with its narrow scope, shows that Congress intended to authorize only a limited adjustment to an otherwise final sentence and not a plenary resentencing proceeding." Dillon, 560 U.S. at 826. And "[g]iven th[at] substantially different purpose" and "circumscribed nature of proceedings" under Section 404, id. at 830, there is no reason to conclude either that Congress intended or that this Court's precedents require that Booker's remedial holding, including the substantive reasonableness review that it requires, would apply in this context.

2. Petitioner contends (Pet. 10-13) that a conflict in the courts of appeals on the standard of appellate review for Section 404 motions warrants this Court's review. But petitioner fails to identify any decision suggesting that this case would have been decided differently by another court of appeals. To the contrary, the alleged conflict appears to be more semantic than substantive. And to the extent that a conflict does exist, it is both recent and lopsided.

Petitioner's reliance (Pet. 11) on United States v. White, 984 F.3d 76 (D.C. Cir. 2020), is misplaced. In that case, the D.C. Circuit described the consensus of its "sister circuits" that "the abuse-of-discretion standard" applies to Section 404 motions, and stated that it would "follow [its] sister circuits and apply the same standard in [its] review of section 404 motions." Id. at 85 (citation omitted). The D.C. Circuit remanded that case, but not because it found the district court's denial of relief to be substantively unreasonable. Rather, it remanded because the district court had narrowly focused on the defendants' "past misdeeds," and the court of appeals could not determine whether the district court had given "any consideration" to the "extensive mitigating evidence [they had] offered." Id. at 93. In contrast, the district court here broadly considered petitioner's "criminal history, public safety issues, offense conduct * * * and the post-sentencing conduct" in resolving his Section 404 motion, and petitioner does not identify any supporting evidence the district court failed to consider. Pet. App. B1 (emphasis altered).

Petitioner also cites (Pet. 11) decisions of the Fourth and Sixth Circuits, stating that reduced sentences imposed under Section 404 "must be procedurally and substantively reasonable," United States v. Collington, 995 F.3d 347, 358 (4th Cir. 2021); see United States v. Boulding, 960 F.3d 774, 783 (6th Cir. 2020). But those decisions likewise do not suggest a conflict that warrants further review in this case. As an initial matter,

Collington and Boulding address circumstances in which the district court has granted a defendant's Section 404 for a sentence reduction -- at least in part -- and therefore, has "impose[d] a reduced sentence," First Step Act § 404(b), 132 Stat. 5222. See Collington, 995 F.3d at 358 (requiring substantive reasonableness review "when a court exercises discretion to reduce a sentence"); Boulding, 960 F.3d at 783 (requiring reasonableness review of a reduced sentence "like all sentences imposed by the district court"). Neither the Fourth nor Sixth Circuit has squarely held that reasonableness review applies in a circumstance in which the district court exercises its discretion not to alter a pre-existing sentence. See United States v. Foreman, 958 F.3d 506, 515 n.3 (6th Cir. 2020) (leaving open the "standard of review that would apply to a district court's denial of a First Step Act motion"); United States v. Flowers, 963 F.3d 492, 497 (6th Cir. 2020) ("The district court's denial of a motion for sentence reduction under the First Step Act is reviewed for an abuse of discretion."); cf. United States v. Mannie, 971 F.3d 1145, 1155 (10th Cir. 2020) ("[U]pon review of a sentence-modification proceeding, this court reviews not the propriety of the sentence itself, but the propriety of the district court's grant or denial of the motion to reduce the sentence.").

Moreover, even with respect to granted Section 404 motions, it is unclear whether the differences in the courts of appeals' terminology carry any practical import. The Fourth and Sixth

Circuits have both made clear that "reasonableness review" of a Section 404 sentence reduction should not duplicate the "reasonableness review" required of plenary sentencing. As the Sixth Circuit has explained and the Fourth Circuit echoed, "the precise contours of such review will no doubt differ [from plenary resentencing] and evolve as [those courts] consider First Step Act appeals." Collington, 995 F.3d at 360 (quoting Foreman, 958 F.3d at 514) (first set of brackets in original). In Collington, for example, the Fourth Circuit explained that it "merely h[e]ld that procedural and substantive reasonableness * * * require courts to consider a defendant's arguments, give individual consideration to the defendant's characteristics in light of the § 3553(a) factors, determine -- following the Fair Sentencing Act -- whether a given sentence remains appropriate in light of those factors, and adequately explain that decision." Ibid.

Even courts of appeals that do not subject Section 404 proceedings to reasonableness review have cautioned that a "district court's decision" whether to reduce a sentence under Section 404 "must allow for meaningful appellate review" and that the district court must "provide some justification for the exercise of its decision-making authority." United States v. Stevens, 997 F.3d 1307, 1311 (11th Cir. 2021); see Mannie, 971 F.3d at 1158 (affirming in light of the district court's "thorough and reasonably articulated basis for its conclusion" "that sentencing relief was not warranted"); United States v. Shaw,

957 F.3d 734, 742 (7th Cir. 2020) ("When, as here, we feel that a court's explanation is 'inadequate,' we may 'send the case back to the district court for a more complete explanation.") (citation omitted).

Petitioner does not identify any practical differences between the "reasonableness review," as defined by the Fourth and Sixth Circuits, and the traditional abuse-of-discretion review applied by other courts. Nor does he identify any decision suggesting that another court of appeals would have found that the district court abused its discretion (or acted unreasonably) in this case, when it considered petitioner's arguments, gave individual consideration to petitioner's characteristics in light of the Section 3553(a) factors, and explained that his original sentence remained appropriate in light of those factors.

3. Finally (and relatedly), even if the question presented otherwise warranted this Court's consideration, this case would be an unsuitable vehicle for such consideration because the district court's denial of First Step Act relief was substantively reasonable. The district court was not required to grant relief, see First Step Act § 404(c), and reasonably declined to do so. Although petitioner's sentence is above the amended guidelines range that would apply today, his extensive criminal history and post-sentencing conduct support the district court's determination that his original sentence remains appropriate. Indeed, the district court declined to reduce his sentence following each of

the intervening retroactive Sentencing Guidelines amendments. See p. 6, supra.

Petitioner's criminal history includes juvenile adjudications for aggravated assault, for evading arrest (twice), for possession of marijuana (three times), for possession of a controlled substance, and for the manufacture/delivery of a controlled substance. PSR ¶¶ 32-36. As an adult, in addition to the drug-distribution crimes to which he pleaded guilty in this case, petitioner was previously convicted for evading arrest, felony evading arrest (twice), possessing marijuana, providing false identification to law enforcement (twice), possessing a controlled substance with intent to deliver, and unlawfully discharging a firearm. PSR ¶¶ 37-44. Petitioner has been cited 49 times in Lubbock, Texas, for a variety of serious vehicular violations, including leaving the scene of an accident and driving on the sidewalk. PSR ¶ 48. And even since his incarceration, petitioner has been sanctioned repeatedly for fighting, possessing a dangerous weapon, possessing drugs and alcohol, being in unauthorized areas, interfering with prison operations, and refusing work and program assignments. C.A. ROA 228.

Thus, even if the district court's decision should be reviewed for substantive reasonableness, that court reasonably determined that petitioner's troubling criminal history and post-sentencing conduct, along with related public safety issues and his offense conduct continued to justify the term of imprisonment originally

imposed in this case. No further review of that determination is warranted.

CONCLUSION

The petition for a writ of certiorari should be denied.

Respectfully submitted.

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SEPTEMBER 2021