PACT:
An Oral History

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I. Introduction

This oral history documents the origins and trajectory of a group run by incarcerated men called the Project for A Calculated Transition (“PACT”) at Green Haven Correctional Facility in Stormville, New York, and their community partnership with students at Yale Law School. Incarcerated activists at Green Haven—a maximum-security prison—created PACT in the wake of the Attica Uprising. While PACT welcomes men of all backgrounds, most of the members of PACT are men of color who grew up in neighborhoods devoid of state investment, and most are serving long sentences for serious crimes. Meanwhile, most, but not all, of the Yale members have been white students from economically privileged communities, and their group includes all genders. The partnership has persisted since 1978.

Over the past forty-three years, this community has generally met every other Monday night to discuss political, legal, and moral issues as peers. PACT’s partnership with Yale Law students has most recently consisted of a reading group where the incarcerated men lead the discussion, though in the past Yale students and PACT members have also taken turns leading discussions. Although the format of the meetings has changed, throughout the years, the members have challenged each other to change their perspectives and forge relationships built on honesty and respect. There have been some years where Yale students were unable to enter the prison, including the period between the start of the COVID-19 pandemic in March 2020 and the submission of this paper in January 2022.

PACT runs restorative justice, research, and educational programming designed to empower its members to grow, develop legal and organizing skills, and give back to their communities. Members engage in peacekeeping in the prison, mentorship, litigation, legislative advocacy, and fundraising for children from poor neighborhoods in New York. Many members
of PACT are jailhouse lawyers who help others in the prison with their appeals; at times, PACT members have organized to bring class actions on behalf of men incarcerated at Green Haven. Due to our inability to interview current members of PACT, many of whom are serving long-term sentences, many of their activities and insights from the last two years are not included in this oral history.

These interviews tell part of a broader story about how men who are incarcerated in New York have combatted the dehumanization imposed by our prisons by creating a community, exercising control over their lives and thoughts, and pushing future lawyers to follow their lead. This first chapter lays out the context in which the Green Haven-PACT partnership formed, the reasons for conducting this oral history, and the methods used. Chapter II discusses the Attica Uprising and massive state violence that immediately preceded PACT’s formation. Chapter III details and explores the New Prison Movement’s formation at Green Haven. Chapter IV explores the activities of PACT in their words and how those activities transformed them. Chapter V traces Yale students’ memories of the program and the impact it has had on them over four decades. Chapter VI argues that PACT’s model, with its emphasis on self-empowerment as change-making, sustained the New Prison Movement through decades of state backlash. Chapter VII discusses challenges the program faces today. Finally, I conclude by emphasizing the revolutionary nature of this community’s subversion of the traditional power structures inside prisons and between incarcerated people and law students.

This project does not claim to represent the full range of opinions or experiences of PACT members or Yale Law students involved with the Green Haven Prison Project. While this oral history only covers part of PACT’s history, I hope it memorializes the resilient and caring men who formed a critical community after our society decided to lock them in Green Haven for
decades. As the partnership continues, I hope this archive can expand as other members add their voices to this history that they themselves are part of.
a. Project Background  

When I started at Yale Law School in the fall of 2019, I had worked with people in prisons for years, and I knew I wanted to work with incarcerated people as a lawyer. My roommate, Sophie Angelis, a co-director of Green Haven Prison Project, asked me to visit PACT with her. Though she had volunteered in prisons before, she said this program felt different. Incarcerated men led meetings and encouraged vulnerability, while Yale students were not perceived as having greater legal knowledge. Most importantly, she said it was a loving community. I joined the program, and by the winter of my 1L year, I had met PACT members, who asked me to share my feelings about my week each time I showed up and cold called me in a conversation about *The Count of Monte Cristo*. The group felt like an incredibly warm space where people could acknowledge their flaws and past mistakes in a way that was uncommon at Yale Law School.

In January 2020, during a visit to Green Haven, PACT member and Elder Statesman Mr. Benjamin Smalls started sharing what he had heard about COVID-19 on NPR. This was the first time I had talked about the possibility of a pandemic. In that session, one of the members, Ming, who was originally from China, cried because he was worried about his family, and he could not make calls to them from the prison. In March 2020, after I had become one of the Yale group’s directors, the lockdown occurred days before I was scheduled to go meet with the leaders at PACT to hear about their vision for the rest of the semester. In early April, we found out that Mr. Smalls, the oldest member of PACT, had contracted COVID-19. Mr. Smalls had applied for clemency from Governor Cuomo, but although he was elderly and sick, Cuomo did not grant clemency, despite the efforts of Yale alumni and activists who reached out to support his application. Mr. Smalls passed away on May 5th, 2020.
As we mourned, the YLS Green Haven directors—Jacqui Oesterblad, Rebecca Lewis, Shiv Rawal, Sophie Angelis, and I—started talking about our concerns for the members of PACT and our concerns for the program. The prison did not allow us to communicate with members outside of meetings and gave us no updates on when we might be able to resume the program. We stayed home, isolated from our communities at Yale and at Green Haven, unable to grieve together. As we reflected over calls about how important Mr. Smalls had been to us, we talked about how so many members had amazing stories that no one had told. We started to interrogate how much we did not know about PACT’s history. We wanted to learn more about our shared community, and we did not want the efforts of so many of the leaders inside the prison who had shaped us to go unknown, so we started talking about conducting an oral history.

In early June 2020, all around the country, people joined mass Black Lives Matter protests after white men and cops publicly killed George Floyd, Ahmaud Arbery, Breonna Taylor, and others. The Green Haven board started talking about how Mr. Smalls’ death related to their deaths: white officials in New York State had forced our friend, an older Black man, to die in captivity, neglecting their promises to let people out of prison on humanitarian grounds. We all recognized how our relationship with PACT members had radicalized us in our thinking on prisons, race, human rights, and our own sense of connection with people behind Green Haven’s walls. We knew the program had roots in the Attica Uprising and older members had ties to the Black Panthers. We also had access to a study that members of PACT had conducted, which identified ways in which structural racism had influenced their incarceration in the 1990s. “Blacks and Latinos together represent less than 28% of the general population of New York State,” the study found, “while at the very same time, they comprise 85% of the total state prison
population, and over 75% of this total state prison population comes from New York City.”¹

With this knowledge and the context of the Movement for Black Lives in 2020, we decided to delve into PACT’s ties to movements for prisoners’ rights and for racial and economic justice.

The co-directors and I established three goals for the Oral History Project. First, we aimed to excavate and preserve the history of this group. This step involved identifying PACT members and YLS Green Haven participants and chronicling what the group has done over time and how it responded to or was affected by events at Green Haven, in New York’s prison system, and in the country. Second, we wanted to investigate the impact this group has had on the people who participated, and on the prison. This included finding out about how former members carried forward the ethos of PACT into their communities and lives outside the prison. Third, we wanted to reestablish connections between people in this group. We hope that the process of outreach and interviews reconnected PACT and YLS alumni with the organization, with each other, and with the current student group.

In the fall of 2020, we started reaching out to people we knew had been in PACT and Green Haven alumni about whether they would be interested in participating in an oral history. We received only positive responses, though many people did not respond. In the spring of 2021, we interviewed the following fifteen people: José ‘Hamza’ Saldaña, Christopher Stone, Ronald Day, Kenny Inniss, Dan Correa, Ryan Cooper, Mark Levin, Corey Guilmette, Julianne Prescôp, Lexie Perloff-Giles, Jonathan Glater, Jean Giles, Bessie Dewar, Ellie Sutton, and Jeff Smith. My research also draws on comments that Shiv Rawal, Joanne Page, Roy ‘Gyasi’ Bolus, Anthony Dixon, Mario Castro, Mr. Smalls, and Anthony Rodriguez shared in 2019 during interviews for a

complementary and ongoing project, the PACT documentary. I have chosen to refer to all interviewees except Mr. Smalls by their first name rather than their last name when not using full names. I made this choice because while the prison staff usually refer to people by their last names, within the PACT-Yale Law School partnership everyone refers to one another by first name or nickname—except for the eldest member, Mr. Smalls. Additionally, I use person-centered language when referring to individuals as requested by Eddie Ellis, but include inmate and prisoner when in direct quotes and when referring to movement or organization names.

This oral history captures these people’s perspectives on organizing, PACT, and the community partnership PACT shared with Yale Law students. Chris Stone, Joanne Page, Jeff Smith, and José Saldaña detail how legal rights and consciousness about prison conditions expanded in the immediate aftermath of Attica and allowed PACT to form and partner with Yale in 1978. Many law students discuss how the PACT-Yale partnership raised their consciousness about the humanity of those in prison, while others detail the decades of backlash against people in prison through which PACT has sustained itself. Kenny Inniss, Ronald Day, and José Saldaña explain how PACT navigated their shrinking rights as “tough-on-crime” policies took hold.

Former members’ reflections on the program demonstrate the significance of such groups for empowering people in prison. Some interviews discuss how the PACT program developed in the context of the prisoners’ rights movement in New York following the Attica Uprising, so I have included a historical overview of that movement as a preface to my discussion of PACT. PACT members have envisioned the program with a focus on the self-empowerment of incarcerated activists, carrying forward the self-determination that members of the Attica Uprising exhibited in 1971. Yet, former PACT member José Saldaña said PACT would never

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want a repeat of Attica, because it was too costly and so many human lives were lost; instead, PACT gets involved in efforts that will help improve conditions in the prison, and in educating people about organizing within the bounds of the prison.\(^3\) This approach to self-determination renders PACT’s jailhouse lawyers important because they can seek remedies in the courts, through legislation, or with the prison administration. In this context, PACT’s community is connected to the broader prisoners’ rights movement.

The narratives in this oral history illuminate how PACT took the lead in their forty-three-year-long relationship with law students, inverting the traditional legal relationship. Most speakers reflected on how jailhouse lawyers in PACT educated the Yale students about litigation. These stories challenge traditional notions of how law students would interact with incarcerated people. Like the legal observers who entered during the Attica Uprising, YLS students are allies and followers of the struggle, not the leaders. PACT members’ leadership in their relationship with YLS students and in their relationship with one another creates space for incarcerated people to build solidarity and pursue their own agendas in an intentionally alienating place.

The interviewees participated in the history of Green Haven Prison and bore witness to growing incarceration in New York and across the United States. We documented this history because this community deserves recognition. The members provide insights into the transformative nature of self-run programming in prisons, while recognizing the ongoing harms of prison. We do not want the story of this group to be lost, like the stories of so many prison groups are. As former PACT member Kenny Inniss—who now works as a Reentry Specialist for incarcerated students in John Jay College’s Institute for Justice and Opportunity—puts it, “We

\(^3\) Interview with José Saldaña, Director, Release Aging People in Prisons, by Lily Novak and Abigail Bazin (February 17, 2021), available online at shorturl.at/kxJU5.
have something to share, so we should share it. If we don’t speak about it, it gets lost. It dissipates and nobody will ever know.”

Because this is an oral history, we wanted to put the narrative-making in the hands of the people telling the story. Thus, we conducted interviews with an eye toward creating an archive filled with stories told by people who experienced that history. The interviews are uploaded in a public folder, so readers can view each narrator’s history.

In total, this archive consists of interviews with fourteen members of this community: three former PACT members, ten former YLS members of the Green Haven Prison Project, and one man who was incarcerated at Green Haven and attended Yale Law School in the 1970s. The former members of PACT have been released from incarceration and the Yale Law members have graduated. These interviews were conducted by the following eighteen members of the Green Haven Prison Project in the spring semester of 2021: Sophie Angelis, Abigail Bazin, Nketiah Berko, Yolanda Bustillo, Justin Cole, Alex Fay, Elsa Hardy, Aisha Keown-Lang, Rebecca Lewis, Marnie Lowe, Hannah Vester, Zoe Masters, Sarah Nathan, Lily Novak, Allison Rabkin Golden, Mila Reed-Guevara, Thomas Ritz, and Eleanor Roberts. Sophie Angelis and Rebecca Lewis, former directors of the Green Haven Prison Project, provided the guiding ideas for the oral history project, supported this research at every step, and emphasized the importance of sharing stories to memorialize this community and its members.

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i. Selecting Interview Participants

We reached out to all the alumni of PACT and Green Haven for whom we had contact information and pursued interviews with each person that told us they were interested in

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participating in the oral history project in Fall of 2020. I thought everyone who participated might be able to share something that we did not know about the program, so I decided to create a survey to gauge interest from alumni. A major limiting factors in selecting more participants was that we did not have the contact information for many people. This included only 127 Yale alumni, a fraction of the program’s total alumni. About thirty of those e-mail addresses bounced back, and we could not find contact information for more than one person who participated in the 1980s. We could only find contact information for sixteen former PACT members, in part because many people in PACT are serving decades-long sentences, so there are far fewer living alumni on the outside. Many former members have been transferred to other prisons or have passed away. Furthermore, prison rules forbid us from communicating with PACT members outside of the prison or exchanging contact information. This paucity of alumni contacts from a forty-year partnership underscored how much information has been lost over the years. This further emphasized the importance of documenting this community.

Between the two groups, twenty-four people responded saying that they would like to be part of the oral history project—seven former PACT members and seventeen Yale alumni. In the Spring of 2021, seventeen members of the Green Haven Prison Project reached out to these twenty-four interested members about conducting interviews via Zoom. We conducted interviews in pairs. Most interviewers participated in two interviews, though a few interviewers only participated in one interview. Our interviewers ran into difficulties scheduling interviews with ten of those twenty-four interested people. Some interviewees stopped responding, while other alumni communicated that they faced a crunch time at work and could not make the time they scheduled. In total, we were able to interview fourteen people.

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ii. **Asking Questions**

Since our goal was for narrators to shape their own narrative, all interviewers had a guide for conducting the interviews and a set of sample questions, though we agreed to follow the story each interviewee wanted to tell, allowing the structure to vary from interview to interview. We called each interviewee a “narrator” to emphasize that they could share the story they wanted, and we called each interviewer an “editor,” because our main role was to help the narrators identify places to expand their narrative or explain further, rather than to lead the interview in service of our own ends.

We encouraged editors to start with a set of questions called “inspiration questions” while allowing the story to go in another direction based on the narrator’s perspective. The editors used the questions to reflect on what the narrators might want to talk about, but they were not bound to those questions and could follow the conversation naturally.

**Inspiration questions for YLS alums included:**

1. What is your preferred name?
2. What year did you graduate from YLS?
3. What do you do today?
4. What motivated you to visit Green Haven Prison with Yale students? Why did you want to go?
5. What motivated other students to join?
6. What years did you visit Green Haven prison with Yale students?
7. What was your role?
8. How often did you go?
9. How many students participated?
10. How many PACT members were there?

11. What were the meetings between PACT and Yale students like?
   a. How were meetings structured and who ran them?
   b. Do you remember what you talked about?
   c. How do you remember the tone or feeling?
   d. Do you remember any PACT members in particular?

12. How did you get to the Green Haven Prison? What was the drive like?

13. What was your understanding of what PACT was, how it operated, and what its role was inside the prison? What do you remember PACT doing?

14. Are there any particular memories you have of your time at Green Haven that are particularly poignant?

15. PACT was started in the aftermath of Attica. Did Attica come up in your conversations with the PACT men? How did the memory of Attica affect or inform the Yale partnership with men in Green Haven?

16. How did your experiences with PACT affect your personal journey?

17. How did your experiences with PACT affect your professional journey?

18. When you think back to PACT and Green Haven all these years later, what comes to mind?

19. The partnership you helped create has been around for decades now and it has grown into a strong and consistent partnership today. How do you feel about that?

20. What did you learn from PACT?

21. Were you surprised by anything you learned?
22. Were there any causes or changes inside the prison that you can remember PACT organizing around?

23. Were there any legal or nonlegal causes beyond Green Haven that you can remember PACT advocating for (e.g., NY state prison reform, sentencing reform, releasing aging prisoners, educational resources for children)?

24. How did you decide on whether to get involved in a cause or which causes to fight for?

25. What stakeholders if any did you engage? What steps did you take to create change (e.g., a strike or negotiations with the warden)?

26. What happened? Were any concessions made or agreements reached?

27. Did you feel like any of the steps you took worked? Did any not work? What measures felt most impactful?

28. Is there anything else you would like to share?

Inspiration questions for PACT alums included:

1. What is your preferred name?

2. What years were you at Green Haven?

3. What do you do today?

4. What motivated you to join PACT? Why did you want to be part of the organization?

5. What motivated other people in the prison to join?

6. What years were you involved with PACT?

7. What was your role?

8. How often did you meet with Yale students?
9. How many students participated?

10. How many PACT members were at meetings with Yale students?

11. What were the meetings between PACT and Yale students like?
   a. How were meetings structured and who ran them?
   b. Do you remember what you talked about?
   c. How do you remember the tone or feeling?
   d. Do you remember any Yale students in particular?

12. How would you characterize PACT during the years you were a part of it?

13. What was the structure of the organization? What were its goals?

14. What was the role of PACT within the prison?

15. What sorts of things did PACT do, in addition to meeting with students from Yale? What did you do?

16. Do you remember any of your fellow PACT members in particular?

17. Are there any memories of your time in PACT that are particularly poignant?

18. You joined the program some years after the Attica Uprising. Did the group talk about Attica? How did the memory of Attica affect or inform PACT?

19. When you think back on PACT and Green Haven all these years later, what comes to mind?

20. How did your experiences with PACT affect your personal journey?

21. How did your experiences with PACT affect your professional journey?

22. The partnership you helped lead has been around for decades now and has grown into a strong and consistent partnership today. How do you feel about that?

23. What did you learn from PACT?
24. Were you surprised by anything you learned?

25. Were there any causes or changes inside the prison that you can remember PACT organizing around?

26. Were there any legal or nonlegal causes beyond Green Haven that you can remember PACT advocating for (e.g., NY state prison reform, sentencing reform, releasing aging prisoners, educational resources for children)?

27. How did you decide on whether to get involved in a cause or which causes to fight for?

28. What stakeholders if any did you engage? What steps did you take to create change (e.g., a strike or negotiations with the warden)?

29. What happened? Were any concessions made or agreements reached?

30. Did you feel like any of the steps you took worked? Did any not work? What measures felt most impactful?

31. Is there anything else you would like to share?

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iii. Documenting Responses

We asked for permission to record each interview, transcribed the interviews, and then sent them to the interviewee so that each person could add or change it in any way they wished. This process allowed the narrators to expand on, retract, or retell things they had talked about. We agreed beforehand that if the narrator wanted to delete something from the interview that the editors found important, the editor could express their concerns, but the final decision rested with the narrator. In our case, no one sought to delete anything after receiving the transcript. Since the
editors altered each final transcript to help the narrative flow, I cite the interviews, but do not place the stories in quotes.

We sent every narrator who participated in the Oral History Project a final transcription of their story, so that they could feel a connection to the archive they helped create.
II. Prison-Made Civil Rights Movements in New York that Led to PACT

a. Movement Formation and Prison Conditions in 1960s and 1970’s

The Post-World War II prisoners’ rights movement developed alongside the civil rights movement that swept the United States starting in the 1950s. By the 1950s, most people that New York incarcerated were Black or Puerto Rican, while the guards in the upstate prisons remained mostly white. In the 1960s, political organizing groups started to develop a presence in New York prisons. Many incarcerated men started to join the Black Panthers, Young Lords, and Nation of Islam, finding solidarity with groups organizing for Black liberation, religious freedom, and recognition of Latinx identity outside of prisons. As such groups challenged the status quo of segregation, state violence, and inequality in the United States and in the world, members in prison found solidarity with broad civil rights struggles.

Concurrently, the federal courts started to strike down state segregation laws, and they began to accept challenges that jailhouse lawyers and prisoners’ rights lawyers brought against prison practices. Prior to the 1960s, federal courts maintained a “hands off” doctrine regarding prison conditions, doing little to protect the rights of incarcerated people, partially due to concerns for states’ rights to administer their prisons. However, in the 1960s, the Warren Court started to recognize that incarcerated people had constitutional rights. In 1962, in Robinson v.

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5 While the prisoners’ rights movement has a national scale, this paper’s discussion focuses primarily on the movement in New York. There were differences in the history of protest and rebellion between Northern and Southern prisons that are not part of this discussion. For a discussion of regional organizing differences see ROBERT T. CHASE, WE ARE NOT SLAVES: STATE VIOLENCE, COERCED LABOR, AND PRISONERS’ RIGHTS IN POSTWAR AMERICA 5-19 (Heather Ann Thompson & Rhonda Y. Williams eds., 2020).
7 Interview with José Saldana, supra note 3.
9 Id. at 440-444.
10 Id. at 435-440.
11 Id. at 433.
California, the Supreme Court held that the Eighth Amendment prohibition on cruel and unusual punishment applied to the states.\(^{12}\) That same year, Gideon Wainwright, an incarcerated man who had not had representation, submitted a \textit{writ of certiorari} arguing that he had a Sixth Amendment Right to counsel. Wainwright won,\(^{13}\) thus ushering in our current system, in which lawyers represent indigent defendants who face incarceration.\(^{14}\) Jailhouse lawyers partnered with political organizations supporting Black and Puerto Rican rights and religious organizations in the prisons to bringing Equal Protection cases.\(^{15}\) In 1964, thanks to the partnership of jailhouse lawyers and community organizations, the Supreme Court held that Illinois prisons could not bar Muslim people’s access to the Quran.\(^{16}\) During the next two decades, jailhouse lawyers became “responsible for the recognition and enforcement of prisoners’ civil rights.”\(^{17}\)

While members of activist groups raised consciousness about civil rights in prisons and jailhouse lawyers started making strides towards jurisprudence that recognized the rights of people in prison, the living conditions inside New York’s prisons remained deplorable throughout the 1960s. As historian Heather Ann Thompson notes in \textit{Blood in the Water}, people in New York prisons faced constant racial discrimination by guards; no medical care; overcrowding insufficient food; and restricted access to toilet paper, soap, and showers.\(^{18}\) Staff routinely used slurs, censored reading material published by non-white authors, threw away letters written in a foreign language, and prevented common-law wives and children born out of wedlock from visiting.\(^{19}\) By 1970, New York had started crowding more people into squalid

\(^{12}\) \textit{CHASE}, \textit{supra} note 5, at 6.
\(^{13}\) \textit{MUMIA ABU-JAMAL, JAILHOUSE LAWYERS: PRISONERS DEFENDING PRISONERS V. THE USA} 206 (2009).
\(^{14}\) All defendants who face incarceration have a right to counsel, \textit{see} \textit{Scott v. Illinois}, 440 U.S. 367 (1979).
\(^{15}\) Jacobs, \textit{supra} note 5, at 434.
\(^{16}\) \textit{See e.g.}, Cooper v. Pate, 378 U.S. 546 (1964).
\(^{17}\) \textit{ABU-JAMAL, supra} note 13, at 207.
\(^{19}\) \textit{Id.} at 12-15.
prisons without hiring or training more correctional officers. The state maintained racial segregation while forcing many incarcerated people to work for $0.06 per day, even when they were ill.\textsuperscript{20} Generally, Black and Latinx incarcerated people were paid less and forced into more grueling jobs than white people, and staff punished Latinx people for speaking Spanish.\textsuperscript{21} Doctors refused to treat patients with broken bones, and least one doctor at Attica experimented on men by exposing them to a virus.\textsuperscript{22} Progress in the courts did not mitigate the blatant discrimination, lack of hygiene, slave labor, overcrowding, medical mistreatment, and arbitrary rules New York imposed.

With no formal grievance process and a prohibition on unions, incarcerated people had few avenues through which to advocate for themselves.\textsuperscript{23} While jailhouse lawyers could seek change through the courts, often, New York prisons would not obey decisions, as Attica did when it continued to censor newspapers after a court ruled that such censorship was illegal.\textsuperscript{24} Thus, many incarcerated activists pushed to change conditions by organizing demands amongst themselves and bringing those to prison administrators.\textsuperscript{25}

In the late 1960s, incarcerated organizers demanded changes and engaged in strikes or uprisings in prisons across the nation, some of which led the prisons to compromise with them. In 1967, five uprisings occurred in prisons, followed by “fifteen in 1968, twenty-seven in 1970, thirty-seven in 1971, and forty-eight in 1972—the most prison riots in any year in U.S. history.”\textsuperscript{26} While many press outlets and “law-and-order” politicians saw this as a sign of
“lawlessness and violent criminality,” these uprisings allowed incarcerated people to make their voices heard. In some cases, like the New York City Jails Uprising, they even led prison administrators to improve conditions.  

27 Robert T. Chase, We Are Not Slaves: Rethinking the Rise of Carceral States through the Lens of the Prisoners' Rights Movement, 102 J. of Am. Hist. 73, 74 (Jun. 2015).
28 THOMPSON, supra note 18, at 21.
b. The Attica Uprising

In 1971, a group of men at the prison in Attica, NY took control of part of the prison for four days and demanded better conditions. By 1971 Attica had hired more reading instructors and started offering sociology classes, which led more people to engage with how the struggles inside and outside prisons were linked. While several leaders during the uprising took inspiration from the civil rights movement and other revolutionary movements, many people rebelled largely in response to the indignities New York officials subjected them to. People had insufficient access to showers and toilet paper, and inadequate medical care, while facing constant discrimination from “many of their keepers.”

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i. The Lead Up

In the months prior to the Attica Uprising, men at prisons in New York and across the U.S. revolted. At times, they gained concessions, but they often faced brutal physical reprisal. Some revolts ended in “intensive discussions,” while others ended with guards “retaking the prisons with nightsticks.” In 1970, incarcerated men took over New York City’s jails to protest overcrowding, and the uprising succeeded in some ways: U.S. representatives Shirley Chisholm and Herman Badillo and New York mayor John Lindsey negotiated with the organizers, before sending more people to prisons upstate. Yet that just increased overcrowding in Attica.

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29 CHASE, supra note 5, at 2.
30 THOMPSON, supra note 18, at 28-30.
32 Id. at ¶ 9.
33 THOMPSON, supra note 18, at 4.
34 Id. at 4.
In 1970, the year before the Attica Uprising, the metal shop at the prison went on strike to protest slave wages.\textsuperscript{35} Soon after, people at another New York State facility, Auburn, took over the prison to demand improved conditions after guards placed fourteen men in solitary for celebrating Black Solidarity Day.\textsuperscript{36} Both uprisings reaped concessions: the Commissioner of Correction agreed to raise wages from $0.06 to $0.25 at Attica,\textsuperscript{37} and the Auburn prison administration promised no reprisals.\textsuperscript{38} In reality, though, both groups faced reprisal. At Attica, the superintendent locked those who went on strike in the worst cells or transferred them.\textsuperscript{39} At Auburn, guards reneged on their promise and beat the protestors. They put 120 people in solitary and charged six people with crimes, transferring them to solitary at Attica.\textsuperscript{40} However, lawyers from the NAACP Legal Defense Fund and New York City ACLU stepped in and got most of the men released from solitary, which according to Heather Ann Thompson “was one of the first times that the prison had lost a disciplinary matter.”\textsuperscript{41}

Despite the harms prison administrators inflicted on protesters, these legal successes demonstrated that incarcerated people could sometimes make prison administrations acknowledge their plight through uprisings. Just as the Auburn Six won release from solitary confinement in Attica based on a federal district judge ruling,\textsuperscript{42} the men in Attica learned that in fall 1970 at Folsom State Prison in California, 2,400 men had presented a list of demands to the administration, gone on strike for 19 days, and then started the first prison union.\textsuperscript{43}

\textsuperscript{35} Id. at 15 n. 50.
\textsuperscript{36} Id. at 23.
\textsuperscript{37} Id. at 17.
\textsuperscript{38} Id. at 24.
\textsuperscript{39} Id. at 17.
\textsuperscript{40} Id. at 24.
\textsuperscript{41} Id. at 24.
\textsuperscript{42} Id. at 30.
\textsuperscript{43} Id. at 33; Ronald Huff, Development and Diffusion Prisoners’ Movements, 55 Prison J. 4, 10 (1975).
By July 1971, a group of five men that included leaders from the Attica and Auburn protests formed the “Attica Liberation Faction” and sent the commissioner a list of demands.\textsuperscript{44} The manifesto stated: “There is no strike of any kind to protest these demands. We are trying to do this in a democratic fashion.” Their demands included legal representation at parole hearings, proper medical care, visitation for families with children, less censorship, higher wages, an end to segregation based on political belief, an end to racial persecution, and an end to punishment for peaceful dissent.\textsuperscript{45}

The manifesto did not generate substantive changes from the administration,\textsuperscript{46} but shared awareness about the violent reprisals that prisoners’ rights activists were facing across the country built solidarity among men in Attica from different ethnic, racial, and political groups.\textsuperscript{47} When, in August 1971, officers at San Quentin State Prison murdered activist George Jackson, who had become famous for writing about the racism in American prisons, many at Attica demonstrated that solidarity by responding with a spiritual sit-in.\textsuperscript{48} By September 1971, men at Attica were united in the knowledge that they had sought relief and found an unresponsive administration.

\textsuperscript{44} THOMPSON, supra note 18, at 31.
\textsuperscript{45} Id. at 32.
\textsuperscript{46} Id. at 34.
\textsuperscript{47} Id. at 35.
\textsuperscript{48} Id. at 36.
On September 8, 1971, after Correctional officer (“CO”) Richard Maroney engaged in a scuffle with Leroy Dewar and Ray Lamorie, the COs at Attica decided to send both men to solitary.\(^{49}\) When the officers came to get Dewar from his cell, they beat him up, then carried him motionless out past the 40 men in his unit who all started yelling because they thought the officers had killed him.\(^{50}\) The next morning, a deputy decided that the unit should not get rec time and locked them in a hallway while transferring them from breakfast.\(^{51}\) Soon, 120 men were locked in a hall without understanding why.\(^{52}\) When one of the COs who had beaten Dewar and Lamorie the night before approached them, they panicked, thinking he was coming to attack them, and started attacking the officers.\(^{53}\) Some men managed to push the gate down, others took an officer’s keys while others beat the COs, and the men outside the tunnel thought “a riot was


\(^{50}\) THOMPSON, *supra* note 18, at 45-47.

\(^{51}\) Id. at 48.

\(^{52}\) Id. at 52.

\(^{53}\) Id. at 52.

\(^{54}\) Id. at 52.
under way.”55 In the chaos of the initial moments of the uprising, several incarcerated people took Corrections Officers hostage, while others attacked each other.56 New York State Police responded quickly, entering the prison with tear gas and guns and taking back A, B, C, and E Blocks.57 But D block remained under the control of the men in the prison.58

By the afternoon of September 9, 1,281 incarcerated people had moved to D yard and started organizing themselves, and they had taken 43 COs hostage. A group of Black Muslim men led by Richard X Clark formed a circle around them to prevent further revenge attacks.59 Jailhouse Lawyer Roger Champen grabbed a bullhorn and appealed to “eliminate fights among ourselves and focus our hostility outside.”60 Authors of the July manifesto and leaders from different groups convened at a table, while others started a medical tent to administer care and figured out how to feed people.61

Within a day, the yard had democratically elected representatives for each of the prison’s blocks—many of whom were jailhouse lawyers, activists, or leaders in the prison—and organized a security force.62 Anyone who wanted could line up to make speeches. The uprising selected typists to write down grievances, and people in the Yard voted on which grievances were most urgent to present in an official statement of demands to prison officials.63 The elected leaders compiled a list of demands, the first of which was amnesty from legal and physical reprisals.64 They also included demands for religious freedom, minimum wage pay, no more

55 Id. at 53.
56 Id. at 55-59, 65-66.
57 Id. at 62.
58 Id. at 64.
59 Id. at 57, 66.
60 Id. at 66.
61 Id. at 68-69.
62 Id. at 69.
63 Id. at 70.
64 Id. at 74.
censorship of reading material, the right to communicate with whom they pleased, realistic rehabilitation programs, release at conditional release dates, and an end to administrative parole revocations.\textsuperscript{65}

The leaders called in lawyers and other observers from the outside to support in the negotiations. While they communicated with those who came inside, they maintained power over the demands. Law professor Herman Schwartz, Assemblyman Arthur Eve, the Commissioner of Corrections, and the Commissioner of Correction came in first;\textsuperscript{66} then Republican and Democratic state senators and congressmen, including Herman Badillo, Thomas F. McGowan, Frank Wakey, Robert Garcia, and Cark Wemple, showed up, as well as New York prison rights organizers from the Fortune Society.\textsuperscript{67} Over the next few days, national figures came “in as observers, to keep an eye on us and keep an eye on the department of correction.”\textsuperscript{68} Black clergymen including Marvin Chandler, Raymond Scott, and Franklin Florence; famed lawyer William Kunstler;\textsuperscript{69} prisoners’ rights activist Tom Soto; Black Panther Bobby Seale; and members of the Young Lords joined.\textsuperscript{70} Reporters from the \textit{New York Times}, NBC, ABC, and others came in with cameras, so “for the first time ever, Americans could get an inside look at a prison rebellion.”\textsuperscript{71} These crews included well-known Black journalists Jim Ingram and Clarence Jones.\textsuperscript{72} One uprising leader, L.D. Barkeley, shared their demand for humane treatment with reporters:

\begin{footnotesize}
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\item \textsuperscript{65} \textit{Id.} at 74.
\item \textsuperscript{66} \textit{Id.} at 72-75.
\item \textsuperscript{67} \textit{Id.} at 103.
\item \textsuperscript{68} \textit{Id.} at 70 n. 35.
\item \textsuperscript{69} \textit{Id.} at 92.
\item \textsuperscript{70} \textit{Id.} at 103, 111, 129.
\item \textsuperscript{71} \textit{Id.} at 77, 91, 97.
\item \textsuperscript{72} \textit{Id.} at 91, 103.
\end{itemize}
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“We are men: We are not beasts and we do not intend to be beaten or driven as such. The entire prison populace, that means each and every one of us here, has set forth to change forever the ruthless brutalization and disregard for the lives of the prisoners here and throughout the United States.”73

The camera crews and witnesses who came in and out to negotiate an end to the uprising saw that men in the secured parts of the prison were being starved,74 which convinced many of them of the urgency of demands for humane treatment and amnesty. On the third day, three observers got the District Attorney to issue a statement saying that he would not bring vindictive reprisals.75

During these four days, people inside the Yard maintained their self-made governance and met with dozens of witnesses, witnesses, politicians, media personnel, and prison officials on their own terms. The Attica Uprising inverted the prison’s typical power structure: people incarcerated in Attica claimed the power to choose leaders, decide who came in and out, speak freely, direct conversations with outsiders to center their needs, and brainstorm changes to their conditions. These men directed conversations with reporters and observers toward their immediate concerns. Their organizing process showcased the creative vision that the men shared of a future in which people behind prison walls could empower themselves to unite and work for change without violent backlash.

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73 Id. at 78.
74 Id. at 108-109.
iii. **New York Officers’ Brutal Attack on Incarcerated People**

The Attica Uprising ended in a state-sanctioned massacre. Throughout the uprising, many New York State and U.S. federal officials, especially Governor Rockefeller, thought the discussions were counterproductive, and they began to plan an armed response. The FBI issued misleading reports claiming that Black incarcerated men had taken all white incarcerated men

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77 THOMPSON, supra note 18, at 80-81, 115, 153-156.
hostage and threatened to kill all the guards, framing the uprising as a race riot. 78 Meanwhile the FBI surveilled civil rights groups’ responses to the uprising, 79 and Governor Rockefeller told all the observers he would not grant amnesty. 80 Although COs spoke to reporters and asked the state to grant amnesty so that a full-on massacre would not occur, the Governor did not budge. 81 On September 13th, 1971, Governor Rockefeller decided to allow local police to retake the prison by force, and the Attica Uprising ended with New York officers murdering men, torturing survivors, and lying to cover up the lives they had taken. 82

That morning, the police took proactive steps to engage in brutality and cover it up. Police commanders ordered officers to remove their nametags and chose to ignore the standard policy of keeping track of guns, instead handing them out to troopers without marking who had them. 83 Additionally, officials ignored the “requirement that officers fill out reports detailing the number of times they had discharged their weapons and why.” 84 The police distributed weaponry the officers were unfamiliar with: .270-caliber rifles with ammunition that Historian Heather Ann Thompson documented “causes such enormous damage to human flesh that it was banned by the Geneva Conventions” as well as buckshot rifles, with munition that scatters. 85

On the morning of September 13, the Governor unleashed approximately 850 troops of heavily armed New York State Police officers, Bureau of Criminal Investigation officers, and Sheriff’s Deputies from eight counties on the unarmed members of the uprising. First, the New York Police flew over Attica dropping tear gas. Then, as incarcerated men and hostages started

78 Id. at 82.
79 Id. at 80-82.
80 Id. at 146.
81 Id. at 149.
82 Id. at 155-156.
83 Robbins, supra note 31, at ¶ 21.
84 Id. at ¶ 21.
85 THOMPSON, supra note 18, at 157.
crawling through the thick air, officers came wearing gas masks and shooting. State troopers shot indiscriminately at incarcerated men and hostages.

Within fifteen minutes, the officers had taken back control of the prison, but they continued committing cold-blooded racially motivated murders for hours after the men had surrendered. One officer told William Maynard, a Black man who had been shot multiple times, to put his hands up; when Maynard complied, he shot him in the arms, then shot another man on top of Maynard and exclaimed, “these Black men are dead.”86 Witnesses saw men who died from gunshots before the end of the day alive and uninjured at the end of initial retaking—including twenty-one-year-old Elliot “L.D.” Barkley.87 Two state troopers emptied twelve bullets into Kenneth Malloy’s head from close range.88 One trooper shot James Robinson fatally, took a photo, and then placed a sword in his hand and took another photo.89 Others saw troopers approach a man lying on the pavement and shoot him in the head.90 An officer shot twenty-year-old Chris Reed four times, stuck his rifle butts into the wounds and yelled slurs at him; Reed awoke stacked “with a pile of dead bodies.”91 To ensure that no officer would be charged for role in the slaughter, the state discarded all photos of officers in the act of killing people.92

In total, officers shot 128 men at close range, killing thirty-nine people and wounding eighty-nine others,93 making Attica the bloodiest one-day encounter between Americans since the Tulsa Massacre in 1921.94 Of the thirty-nine men killed, twenty-nine were incarcerated men

86 Id. at 186.
87 Id. at 191.
88 Robbins, supra note 31, at ¶ 2.
89 THOMPSON, supra note 18, at 189.
90 Id. at 183.
91 Id. at 185.
92 Robbins, supra note 31, at ¶ 22-23.
93 Id. at ¶ 1.
and ten were hostages. Though a group of ten men stayed in front of the hostages, the troops shot those men and started shooting hostages. None of the incarcerated men had guns, and multiple officers suffered gunshot wounds from their peers.\footnote{THOMPSON, \textit{supra} note 18, at 187.}
c. The Aftermath of Attica

i. Backlash Against Incarcerated People

In the aftermath of the Attica Massacre, the Department of Corrections lied to the media, saying all the hostages had died because incarcerated men slit their throats, and that the state had just responded to that brutality.96 The media ran with this story and spread it across the country, leaving the public outraged at incarcerated people. When the doctor who conducted the autopsies shared that all hostages had died from bullet wounds, state officials attempted to discredit him, and the governor sent troopers to intimidate funeral home employees into signing affidavits that there were no bullet wounds on the bodies.97 Meanwhile, President Nixon and Governor Rockefeller treated the massacre as a success.98 Heather Ann Thompson writes that this coverage created “a historically unprecedented backlash against efforts to humanize prison conditions in America.”99 Politicians in the upcoming legislative races around the country received greater funding if they were “tougher on law and order.”100

Inside the prison, the more than one thousand survivors of the uprising faced torture from correctional officers and doctors. Officers kicked men who had been shot on the ground, while others stripped men naked and forced them to crawl through mud and drink urine, smashed dentures, and shot at men in their cells.101 According to Heather Ann Thompson, officers also forced men to “run a gauntlet of club-swinging guards while barefoot and over broken glass.”102 Many doctors the state called in neglected critically injured incarcerated men, instead treating minor police injuries before looking at gunshot wounds while the warden refused to transfer

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96 Robbins, supra note 31, at ¶ 7.
97 THOMPSON, supra note 18, at 228-233
98 Id. at 199.
99 CHASE, supra note 5, at 16 n. 53.
100 THOMPSON, supra note 18, at 562.
101 Id. at 212
suffering men to nearby hospitals.\textsuperscript{103} Those that did treat men faced threats from police officers who tried to obstruct treatment.\textsuperscript{104} The superintendent of the prison even prevented lawyers and doctors who had a court order to enter from coming into Attica.\textsuperscript{105}

Meanwhile, New York State hired special prosecutor Anthony Simonetti to investigate and charge incarcerated people with crimes from the uprising.\textsuperscript{106} Simonetti purposefully did not investigate state official action and tried to pin all the harm on incarcerated men. Many survivors of the massacre faced interrogations without counsel, as well as CO beatings and long-term solitary confinement.\textsuperscript{107} Simonetti ignored incarcerated men’s complaints of torture during his interrogations, while the state hid photographs and records depicting officer misconduct.\textsuperscript{108} Instead, his team beat and intimidated them, forcing men to shout “White Power.”\textsuperscript{109} Officers coerced incarcerated men to testify in front of an all-white grand jury of Attica residents, many of whom were friends with guards.\textsuperscript{110} In December 1972, the grand jury indicted sixty-three incarcerated men of 1,289 crimes, but it did not indict a single officer.\textsuperscript{111}

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\textit{ii. The Prisoners’ Rights Struggle Continues}

Although many white Americans continued believing the state officials’ lies that the media had spread, the coverage of terrible conditions inspired ongoing resistance by incarcerated people and an outcry from activists, including James Forman, Angela Davis, and John

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\textsuperscript{103} \textit{Id.} at 207.
\textsuperscript{104} \textit{Id.} at 208.
\textsuperscript{105} \textsc{Thompson, supra} note 18, at 219.
\textsuperscript{106} \textit{Id.} at 272.
\textsuperscript{107} \textit{Id.} at 299.
\textsuperscript{108} \textit{Id.} at 294.
\textsuperscript{109} \textit{Id.} at 295.
\textsuperscript{110} \textit{Id.} at 305.
\textsuperscript{111} \textit{Id.} at 307.
\end{footnotesize}
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Lennon. Observers of the uprising collected documents, and community groups across New York started a coalition to seek prison reform. In the months after the massacre, community groups reached out to New York legislators, who introduced 150 prison reform bills in the 1972 legislative session, and New York passed eight. Reforms from the years that followed brought to life some to the Attica Liberation Faction’s demands.

Meanwhile, jailhouse lawyers and activist lawyers fought ongoing abuses and criminal charges brought by New York State in court. By December of 1971, 506 incarcerated people had attempted to sue New York for damages. Meanwhile, two lawyers representing men at Attica, William Hellerstein and Hemant Schwartz, brought *Inmates of Attica v. Rockefeller*, seeking an injunction to the ongoing abusive torture and interrogations without counsel at Attica. On December 1, 1971, the Second Circuit ruled that prison could continue interrogating incarcerated men without counsel, abrogating their Sixth Amendment rights, but held that officers had to stop torturing men. Prison officials continued torturing people despite the injunction, so National Lawyers Guild attorneys returned to court to hold Attica’s COs in contempt.

A coalition of jailhouse lawyers and attorneys from the National Lawyers Guild, ACLU, Legal Aid Society, and local community organizations BUILD and FIGHT formed Attica Brothers Legal Defense (“ABLD”) in September 1973. This group aimed to get everyone who had been indicted acquitted and everyone in solitary confinement out. In 1974, ABLD won their

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112 *Id.* at 256-260.
113 *Id.* at 273.
114 *Id.* at 559.
115 *Id.* at 299
116 *Id.* at 299-300.
117 *Id.* at 301.
118 *Id.* at 302.
119 *Id.* at 313-320.
first two trials when the judge dismissed charges against a man named William Smith who had been charged with sexual assault based on bad evidence and jury acquitted Vernon Lafranque.  

As trials progressed, one special prosecutor in Simonetti’s office, Malcolm Bell, became uneasy with his colleagues’ and supervisors’ cover-ups of trooper crimes and blew the whistle on state efforts to prevent him from identifying specific shooters. In 1976, New York’s new Governor, Hugh Carey pardoned everyone involved in Attica, including the officers.

Outside of court, two investigatory legal commissions started revealing the extent of the atrocities the state had committed. Governor Rockefeller created the Jones Committee to investigate the conditions in New York prisons, hoping this would support his narrative. Instead, the Jones Committee released a report criticizing the Department of Correctional Services for its brutality. The committee demanded “more training, more education, less profiteering, less warehousing, more attention to civil rights abuses, less censorship, greater mental health resources, adequate legal assistance supplied to inmates, brighter and cheerier prison facilities, better food, better medical and dental care.” Afterwards, lawyers formed the independent McKay Commission, which included Yale students and was advised by Arthur L. Liman as general counsel. After a year of interviews, the McKay Commission shared that the conditions incarcerated men protested were inhumane, that the state did not have to massacre people when it did, and that the officers had committed atrocities to assert state power. Despite

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120 Id. at 336-339
121 Robbins, supra note 31, at ¶ 19-23.
122 Id. at ¶ 17.
123 THOMPSON, supra note 18, at 274.
124 Id. at 275.
125 Id. at 275.
126 Id. at 278.
127 Id. at 279-284.
these findings, the state has still neither taken responsibility for the cruelty officials inflicted on individuals nor apologized for the lives its officers took that day.\textsuperscript{128}

Attica galvanized incarcerated people across the country to struggle for greater rights. In 1972, forty-eight uprisings occurred in prisons, the most in U.S. history.\textsuperscript{130} Meanwhile, jailhouse lawyers increasingly sought redress in the courts for inhumane conditions. Prisoners’ rights suits increased from 218 in 1966 to 18,477 in 1984,\textsuperscript{131} and between 1970 and 1996, the number of civil rights suits brought by incarcerated people increased by 400 percent.\textsuperscript{132} Jailhouse lawyers,

\begin{footnotesize}
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  \item \textsuperscript{128} Id. at xvii.
  \item \textsuperscript{129} NEW YORK STATE SPECIAL COMMISSION ON ATTICA, ATTICA: THE OFFICIAL REPORT 1 (Jan 1, 1972).
  \item \textsuperscript{130} CHASE, supra note 5, at 2.
  \item \textsuperscript{131} Id. at 6.
  \item \textsuperscript{132} Id. at 6.
\end{itemize}
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most of whom taught themselves the law in prison, pursued many of these suits despite the reprisal and punishment they faced for their advocacy.\textsuperscript{133}

The combined groundswell of activism from those inside the prison, outside lawyers, and activists across the country pushed New York’s Department of Corrections to make some concessions to incarcerated people. The state started providing access to showers, soap, toilet paper, more visits, slightly more medical care, nutritious foods like fruit, a grievance procedure, and allowed incarcerated people to form a self-elected committee to communicate with prison administrations.\textsuperscript{134} The state also funded a network of lawyers to assist incarcerated people called Prisoners’ Legal Services,\textsuperscript{135} and started allowing Muslim people to keep Qurans, own prayer rugs, and meet with imams in prison.\textsuperscript{136} Still, to quell the activism at Attica, the Department of Corrections transferred many men from Attica to other prisons, including Green Haven.\textsuperscript{137} With the new ability to organize among themselves and engage in educational programming, men who had been transferred to Green Haven formed The New Prison Movement, which developed many ideas that continue to guide PACT today.

\textsuperscript{133} Angela Davis, \textit{Foreword}, to \textit{Mumia Abu-Jamal, Jailhouse Lawyers: Prisoners Defending Prisoners v. the USA} 14, 15 (2009).
\textsuperscript{134} Robbins, Schwirtz, Winerip, \textit{supra} note 6.
\textsuperscript{135} \textit{Id.} at ¶15.
\textsuperscript{136} \textit{Id.} at ¶11.
\textsuperscript{137} Interview with José Saldaña, \textit{supra} note 3.
III. The Origins of the New Prison Movement in Green Haven

This chapter draws on oral history contributions from Jeffrey G. Smith, José “Hamza” Saldaña, Dr. Ronald F. Day, and Christopher Stone. It also includes contributions from Dr. Roy “Gyasi” Bolus and Joanne Page’s documentary interviews. Jeff Smith is a partner at Wolf Haldenstein Adler Freeman & Herz LLP who was incarcerated in Green Haven during the Attica Uprising. He became a jailhouse lawyer and follower of the New Prison Movement before later graduating from Yale Law School. José Saldaña is a former member of PACT who is now the Director of New York advocacy organization Release Aging People from Prison. Dr. Ronald Day is a former member of PACT who is currently the Vice President of Programs for the reentry organization The Fortunate Society, which is also based in New York. Christopher Stone, a former Yale Law School Green Haven Prison Project Coordinator, is founding director of Neighborhood Defender Services in Harlem, former president of the Open Societies Foundation, and current Professor of the Practice of Public Integrity at Oxford University. Dr. Roy Bolus is the former President of PACT who is now a counselor and teaches at Yale College. Joanne Page started the Yale Law School Green Haven Prison Project and is the President and CEO for The Fortune Society. The footnotes indicate which stories are told from each of their perspectives.
a. Organizing in Green Haven in the early 1970s

In the aftermath of the Attica Uprising, as New York State moved many of the uprising’s members more than 300 miles away to the Green Haven Correctional Facility in Stormville, New York, prisons began to allow incarcerated men to meet due to what the *New York Times* described as “the tolerance for reform that followed the Attica prison riot of 1971.”

According to former PACT member Dr. Ronald Day, after so many activists were moved from Attica, Green Haven became the political and cultural capital of the New York State prison system. Survivors lived with deep scars from the torture they experienced at Attica, yet they persisted in organizing against the terrible conditions. The people who were there came to be known as forefathers, and they taught the men at Green Haven through oral history about how dehumanizing the conditions were. “The conditions forced the guys to rebel” he recalls. He heard about how the food was rotten and Latino people got brutalized for saying “meet our bro.” He learned that the massacre happened there, how it was done, the voices that were heard by people during Attica. The forefathers shared with him that they saw that for a period the world was looking, and resources were starting to come in, but also recognized Attica as such a huge loss that organizers at Green Haven needed to find a new way forward.

The men’s experience with state violence pushed them to rely on the new official channels, such as their ability to form liaison committees. Two surviving leaders, Larry ‘Luqman’ White and Eddie Ellis, used this new ability to meet in committees to start educational programs for their peers, starting what they called “The New Prison Movement.”

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139 See Interview with Ronald Day, Vice President of Programs, The Fortune Society, by Zoe Masters and Sarah Nathan (March 1, 2021), shorturl.at/kxJU5.
140 See Interview with Jeffrey Smith, Partner, Wolf Haldenstein Adler Freeman & Herz LLP, by Nketiah Berko and Hannah Vester (March 6, 2021), shorturl.at/kxJU5.
141 *The Prisoners’ Alliance with Community*, supra note 1, at i.
Prison Movement was a civil rights movement for incarcerated people in New York. Its liaison committees formed PAC (the Political Action Committee), which eventually turned into today’s group: PACT (the Project for A Calculated Transition).

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143 The following section is drawn entirely from the interview with Jeffrey Smith, supra note 140.

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i. **Jeff Smith’s Memories of early 1970s Activism at Green Haven**

When Jeff Smith received a seven-to-fifteen-year sentence for marijuana sales in 1969, New York sent him to Green Haven, where he quickly fell in with jailhouse lawyers. He had spent a year studying chemistry at SUNY-Stony Brook, so when he met an incarcerated man who worked at the prison’s school, he asked to work there, too. At the school, Jeff met an African American jailhouse lawyer who helped him become a budding jailhouse lawyer. Jeff found he had a knack for explaining the wrongs people experienced and why they wanted relief, but it was difficult to learn from his mentor in 1970, because Jeff was white, and the
administration maintained strict segregation at Green Haven. The prison had two lines for food, one Black line and one white line. He had never been in any environment as segregated as prison was.

Jeff’s tenure in the school was short lived: a deputy at the prison disliked him and took him out of the school, so he could not teach anymore. Instead, he started working in the horribly segregated kitchen. Meanwhile, he kept self-studying as a jailhouse lawyer, and his anger at the racial segregation he experienced pushed him to learn about movements seeking change inside Green Haven.

While he continued to grow as a jailhouse lawyer, the Attica Uprising happened. Within Green Haven, the Young Lords, the Nation of Islam, and the Black Panthers sought space in the prison newspaper to cover it. Jeff started following their coverage.

In the aftermath of Attica, New York transferred Black activist Larry White, who took advantage of the inmate liaison committee concession and used it to start a movement for a prison labor union at Green Haven. His efforts included building solidarity across groups, organizing two Islamic groups and three politically active African American groups: the One Percenters, Three Percenters, and the Black Panthers. With this coalition, Larry White became the founding president of Green Haven’s labor board. He approached Jeff Smith to serve on it, and Jeff eagerly joined. Although there really wasn't a white civil rights group in the coalition, Jeff was able to talk to the Mafia guys about labor issues. They called themselves the Think Tank because they could not call themselves the “Labor Union Board” without facing intense backlash, even though they viewed themselves as a labor union board.

During this time, the prison responded to Attica by allowing inmate liaison committees that elected their members to exist. Because Larry White had already organized the labor union
board, the Think Tank became the first recognized inmate liaison committee in Green Haven. As a part of the Think Tank, Jeff connected with radical New York City labor union lawyers who agreed to represent men at Green Haven who wanted to make demands for humane working conditions. Because the new Commissioner of Corrections had been a Commissioner of Public Health, the Think Tank thought that, given his relatively liberal sentiments for the Department of Corrections the early 1970s, it would be a good time to come out a labor union group. When they did so, the group sought recognition through a lawsuit, while holding out the promise that they would not strike. The Commissioner bargained with them, saying he would recognize the labor union in Green Haven for one year, but the group lost the lawsuit because the Federal judge held that unions we could not be recognized temporarily. Even though they failed to gain union recognition, the Think Tank continued organizing together inside the prison.

As the Think Tank continued trying to make change from the inside, an African American radio reporter came to the prison to meet with their leaders. She covered their activism, and the group gained more recognition. Then, the Think Tank started working with the nonprofit Vera Institute for Justice. They did a study of bail administration of Brooklyn and studied how many people get arraigned in Brooklyn over a three-month summer.

Around the same time, New York started allowing the former Governor of Rhode Island, William H. Vanderbilt, and his wife, Helen Vanderbilt, to volunteer in a reentry program called South 40, where they connected with Jeff Smith. Through this program, the Vanderbilts connected Jeff with a new Columbia Law program that provided representation in parole hearings. Jeff started to represent people in parole hearings, and with the Vanderbilts’ assistance,

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New York Times journalist Paul L. Montgomery came to Green Haven to profile Jeff’s jailhouse lawyering, making him a minor celebrity.¹⁴⁵

With publicity about his accomplishments, reentry support from South 40, and funding from the Vanderbilts, Jeff received an offer for admission and housing at Vassar. He continued working towards his degree at Green Haven, and when he got out of prison in 1973, he completed his B.A. at Vassar. Immediately after, he completed an M.A. at Princeton, where he conducted research with incarcerated men and women. Then, between 1975 and 1978, he

¹⁴⁶ Id.
completed his J.D. at Yale. When he started doing research in Brooklyn’s criminal courts during a summer at Yale, the incompetence he witnessed from almost all attorneys turned him off to a career in criminal law. Still, he wanted to support prisoners’ rights, so he went to Yale’s clinical office and insisted on working on a case at the prison in nearby Danbury. After Jeff joined the team, the clinical team won the case with his assistance. As a formerly incarcerated leader at Yale Law, Jeff set the stage for Yale to start supporting in-prison programming and brought ideas about prisoners’ rights from Green Haven to the law school during the three years prior to the PACT-Yale Law School partnership’s formation.

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ii. *The New Prison Movement’s Non-Traditional Approach*

Survivors of Attica, led by Black Panthers Eddie Ellis and Larry White, started seeking solutions to the terrible conditions through organizing inside the prison system. In addition to the labor-focused Think Tank, they formed other Think Tanks aimed at creating programs for men in the prison.147 Roy Bolus recalls learning that the Think Tanks focused on getting college into prison, developing a system to phone home, creating family reunion programs and therapeutic programs focused on self-reflection, and learning how to identify and combat the problems their home neighborhoods and communities faced.148 Worried that scattered cultural groups weren’t doing enough change the criminal legal system,149 these leaders sought to build political solidarity across groups within the prison, as Jeff Smith witnessed.

Out of the Think Tanks, incarcerated men developed study groups called the Resurrection Study Group and Conciencia, which were led by Black and Latinx men respectively, giving birth

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147 Interview with Roy ‘Gyasi’ Bolus, Lecturer, Yale University (2019).
148 *Id.*; Interview with Ronald Day, *supra* note 139.
149 José Saldaña, Address to Green Haven Prison Project Reading Group, (Nov. 15, 2021).
to the “New Prison Movement.” As part of the New Prison Movement, they investigated the overrepresentation of Black and Latinx people in New York prisons, identified factors contributing to crime, and developed the Non-Traditional Approach to Criminal and Social Justice ("NTA"). The NTA is a framework for critically analyzing the criminal justice system and empowering incarcerated people in their struggle against the harms facing their communities. The goal of the NTA is “to address and combat the disproportionately large number of Blacks and Latinos being placed under the restraints of the criminal justice system” so that men in prison can save youth from coming into the system. The NTA’s motto is “It is time that state prisoners participate in solving the critical problems that affect their own communities.” The approach identifies traditional views of criminal justice as focused on imprisonment as the sole remedy to social unrest, oriented around blaming the individual, and based in white supremacy, which renders them unable to truly address the fact that prison populations are largely nonwhite and impoverished. In contrast, the NTA considers the ethnic and racial composition of its populace, and while it recognizes the importance of personal responsibility for harm to one’s community, it also focuses on the socio-economic conditions and political discrimination those in prison face.

The NTA recognizes that people in prison are often born into oppression they did not create, but they can contribute to oppression by harming others. It pushes people to dedicate their lives to changing oppressive conditions, so they do not contribute to them. In this way, the

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150 Id.
151 The Prisoners’ Alliance with Community, supra note 1, at i; Interview with the late Benjamin Smalls, Litigator, PACT (2019).
152 Id. at ii.
153 Id. at cover page.
154 Id. at i-iii.
155 Id. at i-iii.
156 This paragraph is drawn from the interview with José Saldaña, supra note 3.
NTA encourages individuals to give back not just to rehabilitate their individual defects, but to empower themselves as they empower their communities.

Because of the NTA’s holistic approach to criminal justice, followers view “commitment to struggle as the criteria for empowerment which transcends and renders the question of innocence or guilt irrelevant.”157 In essence, the NTA allows people in prison to empower themselves by committing to support their communities against ongoing violence and discrimination, rather than by pursuing personal penance alone. The Think Tanks’ focus on solutions to oppression, the “New Prison Movement,” and the NTA all led to the development of PACT.158

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iii. José Saldaña’s Recollection of PAC and the NTA159

As early leaders of the Resurrection Study Group, Eddie Ellis and Larry White, developed the NTA under an umbrella organization at Green Haven called the “Political Action Committee” (“PAC”), which would eventually become PACT. The NTA gave PAC members a

157 The Prisoners’ Alliance with Community, supra note 1, at ii.
158 Interview with Ronald Day, supra note 139.
159 The following section is drawn entirely from the interview with José Saldaña, supra note 3.
political identity by connecting their lives as incarcerated people to the history of struggle against imperialism and capitalism all over the world. PAC saw Attica as related to freedom movements all over the world, including national liberation from colonialism around the world and the movement for self-determination by oppressed communities in America. Thus, followers of the NTA identified with social, political, and racial movements led by the Black Panthers, Young Lords, leftists, and indigenous people fighting for their freedom. Members of the Attica Uprising saw their own liberation movement as a struggle for the recognition of their humanity. José learned that Frank Smith, known as Big Black, said during the Attica Uprising, “If we can’t live as human beings, we will, at least, die as human beings.” PAC carried this idea of political struggle forward.

The new prison movement’s idea that people needed to fight for their humanity drew in activists like José Saldaña, who had developed his political consciousness when he was first incarcerated in 1979. Growing up in Spanish Harlem, Saldaña had joined the Young Lords, a Puerto Rican civil rights organization fighting for self-determination. Years later, when José was transferred to Green Haven, he saw Eddie Ellis and Larry Luqman, otherwise known as Larry White, as two of the greatest pioneers in New York State prison history and respected them as educators. As the NTA spread like wildfire, José joined the many people were inspired to contribute to the New Prison Movement.

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iv. The Attica Accord and PAC’s Community Focus

Just five years after the Uprising, in 1976, incarcerated workers at Attica bravely presented a list of demands to the prison’s administration and then stayed in their cells to
strike. The demands included release the day after their sentence expires, confinement closer to their home communities, placing people on the parole board who were independent from the Department of Corrections, accelerated good time, and an increase in temporary release programs. After two days of discussion, the administration and men at Attica agreed to an Accord granting “liberalization of visitation rules, the establishment of a procedure for reviewing disciplinary punishment, a promise to assign inmates to facilities near their home regions where practical and commitment to hire more-black and Hispanic supervisory personnel.” The new Attica Accord allowed men and women incarcerated in New York State to run meeting groups with people from the outside. This paved the way for the Yale Law School partnership with PACT to form in 1978.

PAC emphasized the power that incarcerated people could build with their communities outside the prison and sought to further empower themselves through their new ability to connect with outside groups. The leaders viewed collective action across the walls as important to making changes in prison system and in the communities from which members came. While incarcerated people couldn’t vote, PAC recognized that many people had ties to communities on the outside and encouraged men to make their voices heard by encouraging people they knew outside the prison to vote on their behalf. Saldaña says that men in Green Haven would talk about the “factor of five.” PACT member Kenny Inniss recalls this meant “Although we were

163 Interview with Christopher Stone, Professor of the Practice of Public Integrity, Oxford University, by Sophie Angelis and Rebecca Lewis (Fall 2020), shorturl.at/kxJU5.  
164 Saldaña, *supra* note 149.  
165 Id.
inside, if we could convince five people to get out and vote, and to vote a certain way, then we could swing elections.”\textsuperscript{166} Kenny says this logic still applies, “there are more than two million people incarcerated, so if each of those people can influence five people, then 10 million people might vote a particular way and change political outcomes.”\textsuperscript{167}

Because members saw solidarity with their outside communities as vital to the NTA, by the late 1970s, they renamed themselves the Prisoners’ Alliance with Community (“PAC”). PAC stated that their objectives were:

- To encourage linkage between prisoner organizations and community-based programs that seek improvement in criminal and social justice policies.
- To set standards of personal development and achievement that empower state prisoners to exercise responsibility.
- To perform research and release findings, and to develop community specific correctional program models.
- To act as a catalyst for change and to develop levels of communication between prisoners, their communities, and the criminal justice system.\textsuperscript{168}

PAC identified the concessions gained from Attica as setting the stage for them to engage in a new approach to prisoners’ rights. In 1997, the group wrote in an official document that the community ties in Attica had transformed the style of seeking change: “prisoners vs. prison administration becomes prisoners plus community vs. prison administration so as to include community elements on the side of prisoners.”\textsuperscript{169} In the same official package, PAC also

\textsuperscript{166} Interview with Kenny Inniss, supra note 4.
\textsuperscript{167} Id.
\textsuperscript{168} THE PRISONERS’ ALLIANCE WITH COMMUNITY, supra note 1, at iii.
\textsuperscript{169} Id. at 7.
attributed other gains to Attica: “More minority correctional officers and staff hired; volunteer services developed to handle cultural needs of the new majority; colleges are given open-door policy, and the first African-American Commissioner is hired; all of these changes are direct results of Attica.”

To further capitalize on these concessions, the men at Green Haven “sought greater ties with minority community” groups. Thanks to the efforts of the Think Tanks, New York State allowed higher education institutions to start providing classes in prisons. By 1979, PAC had formed “their own development programs by utilizing their talents and community input” from outside groups like NAACP and the Jaycees (Junior Chamber) leadership training programs.

Despite tracing their movement and gains back to Attica, PAC also recognized the huge backlash to the Attica Uprising, and the fact that many of its demands were still unmet. They remained cautious not to advocate for a repeat, instead using legal channels to push for change. José Saldaña says that followers of the NTA did not and will never advocate for another Attica. “It was too costly for incarcerated men,” he says, “so many human beings’ lives were lost and people in prison experienced very little gain.” After Attica, New York increased mass incarceration, and during the 1970s New York started dishing out lengthier sentences like they were nothing, giving out fifty years or seventy-five years. Meanwhile, “the parole board wasn’t releasing people,” Saldaña says. New York went up to about 70 prisons two decades after Attica, at the height of mass incarceration.

170 Id. at 7; but cf. Robbins, Schwirtz, Winerip, supra note 6, at ¶ (Almost all guards at upstate prisons are white).
171 THE PRISONERS’ ALLIANCE WITH COMMUNITY, supra note 1, at 7.
172 Id. at 7.
173 Id. at 7.
174 Id. at 7.
175 Interview with José Saldaña, supra note 3.
176 Interview with José Saldaña, Director, Release Aging People in Prisons (2019).
177 Interview with Kenny Inniss, supra note 4.
“PACT stepped up to train its members to articulate ourselves and to pursue self-empowerment while dealing with the overall oppressive conditions we inherited.”\(^\text{178}\) Thus, while PAC used the tools that Attica provided to empower the prison community and the men’s home communities, every time a teenager came in with a life sentence, the group reminded them that they had to fight for their humanity in ways that would not lead to massacres.

Men at Green Haven turned to the courts to vindicate their constitutional rights. In 1979, a class of incarcerated men secured representation by The Prisoners' Rights Project of the Legal Aid Society of New York to challenge the grossly inadequate medical care they received.\(^\text{179}\) Together they filed a 42 U.S.C. 1983 against New York State, its Department of Correctional Services, Green Haven Correctional Facility, and their medical personnel for providing unresponsive medical care.\(^\text{180}\) In 1982, because of legal activism within Green Haven, the Southern District of New York approved a consent decree governing provision of medical care at Green Haven.\(^\text{181}\) While the consent decree forced the prison to provide care, Green Haven frequently failed to fully follow it, and over the years, many men have petitioned the court pro se to find the prison in contempt of the Milburn Decree, though exhaustion requirements and evidentiary burdens have led the courts to dismiss most claims.\(^\text{182}\) Cases like this have made jailhouse lawyering all the more important to members of PAC.

PAC further sought to illuminate systemic racism in the criminal justice system, identifying a long and ongoing history of the disproportionate incarceration of Black and Latinx

\(^{178}\) Interview with José Saldaña, supra note 176.


\(^{180}\) Id.

\(^{181}\) Id.

\(^{182}\) Id.
people from poor neighborhoods in New York. In 1979, under the Think Tank, PAC researchers conducted the "seven neighborhoods” study where they found that 75% of the mostly Black and Latinx people incarcerated in New York, who were overseen mostly by white guards, came overwhelmingly from “seven neighborhoods.” The Think Tank published this study under the title “The Nontraditional Approach to Criminal and Social Justice.” In response to their findings, PAC sought to organize even more of their own programming to address the experiences the prison’s largely Black and Latinx incarcerated population faced. PAC started to disseminate the information that their researchers had found across the prison, drawing more followers to the NTA.

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v. Yale Law School Partners with PAC

After the Attica Accord revised many prison rules about life inside, including the right to meet as a group with sponsors from the outside, PAC started to seek sponsors from outside of the prison for their meetings. By 1978, there were probably six groups that met inside, two of which were sponsored by the NAACP and the Jaycees. In order to be a sponsor, as Yale Law alumnus Christopher Stone explains, the outside groups had to send a letter vouching for the group, and sponsor members had to show up occasionally.

Yale Law student Joanne Page took advantage of the new ability for sponsored groups to meet with outsiders the semester after Jeff Smith graduated, in the fall of 1978. Joanne had been volunteering in prison since she was 18, and decided to start engaging in sponsored meetings at

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183 The Prisoners’ Alliance with Community, supra note 1, at 2.
184 Id.
185 The following section v. is drawn from the interview with Christopher Stone, supra note 163, the interview with Joanne Page, President and CEO, The Fortune Society (2019), and the interview with José Saldaña, supra note 3.
186 Interview with Christopher Stone, supra note 163
187 Id.
188 Id.
Green Haven. After hearing her peers who came from privileged backgrounds talk about policies that would impact people they didn’t know, she wanted to create a space for Yale Law students and men at Green Haven to learn from each other. So she borrowed her father’s picture framing van and drove to Green Haven to meet with PAC in 1978 to propose the partnership, taking her classmate Christopher Stone with her.

Chris Stone recalls that students from Yale started visiting Green Haven frequently in 1979. At the time, Yale students met with men through the JC sponsor, but Yale was not a sponsor. Yale Law did not recognize it as a formal program either; Yale Law students got in a car and went out to meet with men without any consciousness of it from the administration.

José recalls that at first, New York’s prison administrators allowed these meetings between outside groups because it made them look humane after Attica. The prison officials did not see the men as able to come together to create political change. But then in the late 1970s PAC successfully reached out to New York congresspeople and connected them with their families, and New York State started to see the NTA as dangerous. So, the prison administration started to try to shut down incarcerated men’s ability to maintain community connections.

Since the state wanted to shut the groups down, they kept raising the requirements for groups to remain sponsored and required groups to meet more often. “The group we were meeting with kept getting into trouble,” Chris Stone says, “because the prison said the sponsoring organization was not meeting with them enough, even though Yale students were showing up a lot.” Since the JC’s sponsorship did not meet the state’s raised requirements, the

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189 Interview with Joanne Page, supra note 185.
190 Id.
191 Id.
192 This paragraph is drawn from the Interview with Christopher Stone, supra note 163.
193 Saldaña, supra note 149.
194 Id.
195 Interview with Christopher Stone, supra note 163.
group at the prison formed a formal partnership around 1981 with Yale Law School’s sponsorship. At the time, Chris had taken over leadership on the Yale side from Joanne. In his recollection, the prison required the men to rename the group so that they could continue coming, so the men came up with PACT, the Project for a Calculated Transition.

Because the PACT-Yale Law School partnership met each new requirement, the prison allowed the group to keep meeting, but the law students continued to struggle to keep up with the state’s requirements. The prison kept trying to shut the group down throughout the early 1980s, but whenever they tried, the students would set up a meeting with the Deputy Commissioner of Programs to convince him to let the program continue. To meet the requirements, Chris wrote many letters vouching for the group over his three years at law school. Each time the law students came to Green Haven, the men would tell them about new rules the prison had imposed and new things they would no longer be able to do. By the time Chris graduated in 1982, the only group that still had sponsorship was PACT. Though a friend of his took over, Chris had seen so many groups shut down that he doubted PACT would last. Nevertheless, the group has sustained itself inside the prison for over forty years, and YLS students have continued visiting.

During his time visiting Green Haven, Chris built strong ties with PAC’s leaders. He maintained his friendship with Mustafa Malik, who was the principal organizer of PACT, and still remembers his sadness when Mustafa died in prison several years later.

Chris saw PACT as focused on having meetings with Yale Law Students. He remembers that Eddie Ellis came to meetings, but remained on the periphery of PACT, because he ran the newspaper and was organizing other groups at the prison. Chris’s interview indicates that through the 1990s, PACT may have remained a subgroup of PAC that met with Yale Law students and focused on political organizing but was technically separate from related groups.
like the Resurrection Study Group.\textsuperscript{196} Kenny corroborates that the Resurrection Study Group was separate.\textsuperscript{197} According to José Saldaña, who first joined PAC in the 1980s before being transferred out of Green Haven and then rejoined when he returned in 2016, the group’s name remained in flux for years before settling on PACT (Project for A Calculated Transition) in the 1990s.\textsuperscript{198}

Although memories differ on exactly when the group’s name changed from Political Action Committee to Prisoners’ Alliance with Community to PACT, the group kept the same values throughout.\textsuperscript{199} After more than forty years, PACT still carries forward the NTA and New Prison Movement’s principles as a multi-faceted self-empowerment organization that contains the core message of these groups and recognizes Attica as part of its legacy.

\textsuperscript{196} Interview with Christopher Stone, supra note 163.
\textsuperscript{197} Interview with Kenny Inniss, supra note 4.
\textsuperscript{198} Interview with José Saldaña, supra note 3.
\textsuperscript{199} Id.
\textsuperscript{200} E-mail from Christopher Stone, Professor of the Practice of Public Integrity, Oxford University, to Eleanor Roberts, Student, Yale Law School (Dec. 27, 2021, 5:59 PM) (This photo captures Family Day inside the Green Haven Yard in the summer of 1981. Christopher Stone and his wife, Anne Mackinnon stand in the center with Mustafa Malik, his wife and daughter on the right. The two kneeling men are David Keyes, a videographer with New Haven Legal Assistance, and his assistant. The other standing man is a member of PACT, and the woman is a Yale student).
IV. **PACT’s Initiatives Over Forty Years**

This chapter draws on Dr. Ronald F. Day, Kenny Innis, and José “Hamza” Saldaña’s oral history contributions, as well as documentary interviews given by Mario Castro, Dr. Roy “Gyasi” Bolus, Anthony Dixon, Anthony Rodriguez, and “The Elder Statesman” Benjamin Smalls. Kenny Inniss is a former member of PACT and current Reentry Specialist for the John Jay College Institute for Justice and Opportunity, where he supports people making the transition from college in prison to release. Mario Castro is one of the current leaders of PACT, who serves as the Secretary. Anthony Dixon is a former member of PACT who is the Director of Community Engagement for the Parole Preparation Project, which supports people in parole hearings in New York. Anthony Rodriguez is a current member of PACT. Benjamin Smalls was a leader of PACT and law library litigator who passed away from COVID-19 in the spring of 2020, while Governor Cuomo was ignoring his petition for medical clemency. The footnotes indicate which stories are told from each of their perspectives.
a. The Many Facets of PACT

PACT is a group that seeks self-empowerment through community building, education, self-reflection, legal advocacy, and pushing for change within the prison. In Ronald Day’s view,201 PACT sees that prisons are not designed for rehabilitative purposes, so its members resist that failure by empowering themselves. Because so few people are rehabilitated by prison, PACT sees themselves as essential to helping members do what they can to grow in spite of prison, including organizing, recognizing change will not happen if they do not make it happen. The group traces this form of resistance to the ways men organized to congregate, to learn together, and to bring in people who wanted to contribute after Attica. According to Ronald, PACT has continued to resist their oppression by asking, “What are the problems in this prison that we could address? And what are the solutions? And how can we be better individuals, despite the oppression we have to deal with in the prison environment?” These questions led PACT to take a multi-faceted approach to its members’ problems, creating an array of programming and organizing efforts. This programming focuses on community development, personal development, spiritual enhancement, leadership, and prison problem-solving.202

PACT runs programming for its members throughout the week.203 Generally, every other Monday evening, the men meet with Yale Law students to discuss readings and engage in an intellectual community exchange. On the other Mondays, they engage in other workshops that involve legal studies where they learn about civil suits and legislative organizing around political causes. On Tuesday evenings, they run personal growth courses called Character Research and Challenge 2 Change. PACT also studies the history of movements, engages in conflict-resolution

201 This paragraph is drawn from the interview with Ronald Day, supra note 139.
203 Eleanor Roberts’ recollection. See generally Interview with Ronald Day, supra note 139; Interview with José Saldaña, supra note 3; Interview with Kenny Inniss, supra note 4.
at the prison, and mentors fellow incarcerated men. Many members work in the law library, supporting peers in appeals and in civil rights suits. PACT owns a copy machine that others in the prison can pay to use, and they use the proceeds they earn from it to raise funds to organize annual fundraisers, which have frequently involved providing school supplies to kids from their home communities. Once a year, they organize a celebration day with Yale Law students, and in the 1990s, they used to have yearly conferences where legislators would visit the prison. Most importantly, they have maintained a self-empowering community amid a mix of apathy and discouragement from the prison. PACT has managed to keep all this programming going through decades of backlash against incarcerated people in part by remaining cautious about organizing in ways that could lead the administration to retaliate and harm their members.
b. Joining the PACT Community

From its origins, PACT has wanted to attract people dedicated to changing the prison and themselves, so the group decided to select its members from among people current members saw making contributions in the prison.204

Ronald Day remembers that he started working in the library shortly after he got to Green Haven in 1994.205 After a little more than a year at Green Haven, a member of PACT approached him to ask if he was interested in joining. That member gave him a rundown of the program’s design and Yale students’ involvement, and Ronald knew this was something he would love to be involved in. He joined in 1996, became good friends with the leaders of PACT, Chill and Jafar, and remained an active member of the group until he left Green Haven in 1998.

During that time, Ronald got to share in the members’ earnestness about wanting to learn and transform their communities. He also learned to recognize the community he was in, and not just the one he came from, as his community, because PACT saw the prison as a community. As he welcomed new members, he realized that PACT tried to bring in folks with that community mindset and yearning to learn and saw that men with those qualities gravitated towards PACT.

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204 Interview with Roy ‘Gyasi’ Bolus, supra note 147.
205 This paragraph is drawn from the interview with Ronald Day, supra note 139.
When Kenny Inniss\textsuperscript{207} got to Green Haven in 1990, he spent a lot of time in the law library because his case was on direct appeal. He heard about PACT and their involvement with Yale Law students from other members of the prison, and he was eager to join. In 1991, he signed a disbursement form and paid his dues, officially becoming a PACT member. He felt lucky because many people who wanted to join PACT were not chosen. For Kenny, was so exciting to join and get to learn from men who had been instrumental in developing college programs in prison, some of whom were still at Green Haven. PACT looked to the older men who were there at Attica as they introduced transformative programming as leaders at Green Haven. Kenny says that the community enveloped him and helped change his life. He felt like, once he developed those relationships, he was involved in a positive movement, and positive changes gravitated to him. Once a man became a PACT member, he stayed a member until he left or was transferred out, and Kenny remained an active member of the group until he was transferred out of Green Haven in 1999.

Kenny also saw PACT’s community ethic as extending beyond its membership. He remembers coordinating with other organizations in the prison and embracing the “each one, teach one” ideology. PACT taught him not to think of himself with the rugged individualist mentality he had before incarceration, because they valued thinking about others and seeking change communally. He found that mindset humanizing.

Kenny found that those years of community led to lasting relationships. PACT keeps in touch with members who have gone home, and he has reconnected with some former PACT members on the outside, and in other prisons. “Every time I run into a PACT member, I’m filled

\textsuperscript{207} This paragraph and the following paragraph are drawn from the Interview with Kenny Inniss, \textit{supra} note 4.
with such a good feeling,” Kenny says. He has always valued those relationships, because PACT taught him not to be on an island by himself.

José Saldaña got to join PACT twice—first he was recruited into PAC in the late 1980s, and then when he returned to Green Haven after multiple transfers in 2016. The first time, he gravitated towards PAC members’ political consciousness because of his existing roots in the Young Lords. When he returned to Green Haven in 2016, he had faced repeated denial for parole by the Parole Board, but he remained focused on getting out of prison. This drive encouraged the leaders to invite him to join PACT again, which José appreciated, because he could not have rejoined PACT without an invitation. Several people vouched for him. José respected that the process was selective because the criteria forced the organization to maintain high standards.

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209 This paragraph is drawn from the interview with José Saldaña, supra note 3.
Invitations were not based on elitism; instead, the group opened its doors to people who showed that they shared PACT’s values of learning and community.

Current member Anthony Rodriguez affirms that this ethos underlies the group’s selectivity: “PACT is a community of people who care, who want to see something different inside a prison system and want to see people do better for themselves,” he says. “When I need help, I go to them, and they build me up.”

210 Interview with Anthony Rodriguez, Member, Project for A Calculated Transition (2019).
c. PACT’s Movement Studies Led to Giving Back

Over the years, PACT has continued pursuing the Non-Traditional Approach to Criminal and Social Justice (“NTA”) by studying the history of social movements, Attica, and prison demographics. Ronald Day\(^{212}\) remembers that during the 1980s and 1990s, PACT members would talk about the Attica Uprising as integral to the program’s ability to exist and study the legislation Attica had spurred in the law library. Since some of the men in PACT had lived through Attica, the newer members did not want to forget what happened, and they remained motivated by the change that flowed from liberalizing legislation. They also studied the history of resistance to social and racial injustice outside of prisons in the United States and talked about how their movement was tied to others trying to uproot the legacy of racism in America.

José\(^{213}\) says that, during both of his tenures in the group, PACT studied movements so they could develop themselves into leaders who could change the conditions they lived under in the prison. In the 1990s, José facilitated classes within the group that emphasized historical connections with the movements, including the history of the Black Panther Party, the American Indian movement, Puerto Rican independence, and the Young Lords in the curriculum. José made these movements personal, sharing his own story as member of the Young Lords with men who had never even heard of them. PAC saw Movement Studies as part of the NTA, because it helped members see beyond frameworks that attributed crime to individual defects so they could instead contextualize the conditions they had been born into within movements against oppression. As PACT members attempted to better themselves, they gained the understanding that they needed to engage in collective action to overcome their oppressive conditions.

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\(^{212}\) This paragraph is drawn from the interview with Ronald Day, \textit{supra} note 139.

\(^{213}\) This paragraph is drawn from the interview with José Saldaña, \textit{supra} note 3.
Many PACT members saw themselves as having harmed their outside community and sought to channel the collective action frameworks they learned about toward engagement in efforts that would help their communities. In addition to pushing the people they knew to vote using the “factor of five,” PACT undertook initiatives to provide for youth in their home communities and sponsored Family Day events. Since PACT members worked in the law library and ran the copy machine, they started an annual fundraiser for kids from their communities with the proceeds from people making copies. Every year, as part of the “Excel in School” project, PACT buys backpacks loaded with school supplies and distributes them to school-aged visitors. Secretary Mario Castro says that he and his peers value the opportunity to interact and socialize with people from the outside community in a positive way. PACT developed this project after studying movement groups like the Black Panthers, who ran the Free Breakfast for Children program.

3 Mario Castro Reflects on the “Excel in School” Project

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214 Interview with Kenny Inniss, supra note 4.
215 Interview with Mario Castro, Secretary, Project for A Calculated Transition (2019).
217 See Interview with Mario Castro, supra note 215.
219 Id.
Studying the history of movements and engaging in collective fundraising transformed the way that José Saldaña thought about himself and others, pushing him to embrace inclusivity over the years. He remembers a time in the early 2000s when he oversaw a cologne fundraiser and refused to sell to a gay man who wanted to buy some of the cologne, and he now feels as if he treated that man like he was not a human being. A couple of days later, José recalls, that man asked him, “I hear that you were involved in some good things, but if that is true, then how do you justify oppressing me?” José thought about what the man said in his cell for a few days and had no answer. Through Movement Studies, he had established a set of values to live by, so he went back and told the man, “I'm very sorry, it will never happen again and anybody who I have influenced to mistreat you, I will go back to them and tell them that I was wrong.” José came to believe that one of the fundamental defects of lot of social movements was that they did not address the phobias that led them to exclude people. As he grew, he made sure PACT did not exclude people, and this ongoing emphasis on non-exclusion can be traced back to the nontraditional approach.

220 Vimeo: Project for A Calculated Transition, supra note 211.
221 This paragraph is drawn from the interview with José Saldaña, supra note 3.
d. Personal Development Studies

PACT runs programs focused on personal development for both members and people who are not in PACT. On Tuesdays, the group runs the Character Research Course, a holistic approach to character development that includes elements of restorative justice. José Saldaña sometimes taught this course, and Mario Castro teaches it now. In Character Research, the members identify people who care about them, identify their victims, discuss the harms they have suffered and the harms they have caused, and then act out conversations in which they try to take responsibility and apologize. These highly emotional meetings help some members reckon with negative parts of their past that they cannot take back and commit to moving forward in a better way. One of the course’s main mantras is: “We are all works in progress.”

Drawing on evidence from their collective experiences, José and two friends developed a related program that PACT still runs, called Challenge 2 Change (C2C). C2C is an 18-week therapeutic workshop designed to address criminal thinking, behavior, and attitudes and aimed at helping incarcerated people transform their lives and return to their home communities as “returning citizens” and assets to their communities. These goals reflect PACT’s core principles and values. C2C is still facilitated in Green Haven and other prisons across the state.

Through these two programs, PACT members learn to take full responsibility for the harm that they have done and constantly check in on themselves so that they will not continue to harm people. PACT members recognize that they live in a racist society, but they focus on solutions through discussions about how not to contribute to their own oppression. The group

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222 Interview with José Saldaña, supra note 3.
223 Eleanor Roberts’ recollection of visiting on Tuesday evenings.
224 Id.
225 Id.
226 The following four paragraphs are drawn from the interview with José Saldaña, supra note 3.
runs these programs for people who are not in PACT as well, empowering the individuals who attend these programs so more people in the prison can address their own issues.

José says that the members of PACT are grateful to these programs for teaching them a new set of values. Like many people who face incarceration, José grew up in poor neighborhoods in New York, where he says he learned not to trust people, instead embracing manhood through aggression. Most times, he says, this was to the detriment of himself and those who loved him. PACT redefined concepts like courage for him—from recklessly shooting up a place, getting away, and rejoicing over something horrible, to treating everyone like a human, no matter how others responded to them. Many people coming into prison define love as something situational, José reflects, but PACT encouraged its members to embrace love as something uncompromising that deeply touches the heart and soul of the human being. “Many of us had been introduced to this type of love by our mother, but PACT pushed us to value it,” he says. This transforms the image PACT members have of one another, and of themselves.

PACT’s emphasis on the value of human life gave José and his peers something to hold onto at the worst period of their lives. During a 25-years-to-life sentence, which José saw as “death by incarceration” because the parole board was not letting people out, PACT helped him to challenge homophobia and grow as a human being. He witnessed this same change in 2016, when the leader of a gang joined C2C and came to every session. During the last day of class, José recalls, the gang leader said “Y’all changed my life,” and he brought that back to the many other people he had influence over, which improved the prison environment. The state is still oppressing PACT’s members today, and these values give them something to hold onto. So many of the people José loves died in prison, but he says that the values he learned with the
Young Lords, the Resurrection Studies Group, and PACT sustain his work as Director of the nonprofit Release Aging People in Prison (RAPP) today.

Kenny remembers that PACT members engaged in similar therapeutic work through the Resurrection Study Group during the 1990s.227 This forerunner program created the template for the Character Research Course by pushing each member to define what “bad acts” were, why they had acted badly, and then determine not to do those acts anymore. In the Resurrection Study Group, members thought about recognizing wrongs as essential to earning the right to be allowed back into their communities after prison; the members felt needed to give their communities evidence that they were worthy to rejoin them. So, they reflected on why they harmed others, how to accept the harm they had caused, how to make amends with themselves and others, and how to heal so that they would not have baggage holding them back.

They had these discussions about the harms they had caused in the context of their traumatic experiences, many of which had to do with poverty and structural racism. PACT members tied their experiences back to PACT founders’ original seven-neighborhood study, published as the “Non-Traditional Approach to Criminal and Social Justice.” They recognized that most of them came from the 18 most underfunded assembly districts in the state and grew up with systemic racism, undereducation, family breakdown, and disproportionate health issues. Kenny recalls that they recognized that because the resources were not there, people started committing acts that could lead them to a place like Green Haven, a maximum-security prison.

Kenny appreciates that forefathers from the Attica era researched, wrote, and shared these therapeutic curriculums, because they gave him an “imaginal education.” He learned to imagine the results that he wanted from life, look forward to the future, and deal with his depression to

227 The following four paragraphs are drawn from the Interview with Kenny Inniss, supra note 4.
achieve his goals. This form of thinking helped him fight back against his sense that living in this maximum-security prison with so many lifers meant he lived in the graveyard of the living dead. Instead, Kenny and his fellow PACT members nurtured their emotional needs and realized they still had worthy goals and aims.

Doing this deep introspection taught Kenny to focus on health, education, and spirituality. He started to recognize that he faltered when he opened his mind to others’ negative influence, and he identified formative highs and lows in his life, including, traumatic events such as the experience of becoming incarcerated. Doing so helped him learn to deal with the “residue” that stopped him from living out his potential. He brings those tools to therapeutic spaces he runs today with returning citizens at the John Jay College Institute for Justice and Opportunity.
e. PACT’s Verbal Arena with Yale Law School

i. Ronald Day’s Experience

From the fall of 1978 until March 2020, when COVID-19 shut down outsider entry into New York prisons, PACT tried to meet every other Monday with Yale Law students in a discussion group, dubbed the Verbal Arena. By the mid-1990s, PACT and YLS focused mostly on discussions of legal research. On the alternating Mondays when they did not meet with Yale students, PACT met alone to prepare for the next session.

Ronald Day remembers the experience of organizing seating for the Verbal Arena fondly: there were about 12 students and at least a dozen PACT members, and they would sit one student, one PACT member, one student, one PACT member, so that people would really talk to each other. The law student and PACT coordinators always developed the agenda for the semester during a pre-semester meeting where they would talk about different issues that they wanted to explore. Once the prison and a professor at the law school had approved readings, PACT members came to the meeting having done a reading about specific laws or other topics they planned to discuss. Ronald remembers feeling anxious to make sure he offered an intelligent perspective. PACT members emphasized preparedness and made sure everyone read beforehand, so that if anyone had specific questions, others might be able to help them answer them.

When the law students arrived, they would have read the materials, too, and PACT would engage with them in a spirited, robust conversation about the week’s topic. They talked about relevant issues: in 1996, when the Anti-Terrorism and Effective Death Penalty Act (“AEDPA”)

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228 The following section i. is drawn from the interview with Ronald Day, supra note 139, except for portions cited to other interviews.
229 See Interview with Christopher Stone, supra note 163; Interview with Kenny Inniss, supra note 4; interview with Bessie Dewar, supra note 216; Eleanor Roberts’ recollection.
230 See interview with Ronald Day, supra note 139; Interview with Kenny Inniss, supra note 4.
231 The following five paragraphs are drawn from the interview with Ronald Day, supra note 139.
passed, the men studied the statute and talked to the students about how it impacted them. When the law students saw PACT members knew more about the statutes than they did, Ronald recalls, they would often say PACT members should be at Yale Law with them. Since most of the law students had never set foot in a prison before and their understanding of prison was shaped by dehumanizing ideas that permeate American culture, a lot of them had their understanding of prison reshaped by PACT members. Ronald remembers that synergy between the two groups infused meetings, because they shared a love of the law and a desire to transform the criminal justice system. These stimulating conversations gave PACT members a partnership with an outside community and hope and faith that things could be better.

PACT members brought the group’s ethos into the Verbal Arena, too, telling each other to make sure that they were thoughtful about their comments. They did not want conversations to focus on throwing blame; instead, they wanted to always accept responsibility for their actions and focus on themselves. Even if someone said something questionable, they would prepare to ask the person to provide more perspective on that point, without criticizing them or making them feel bad. PACT brought this same thoughtfulness to difficult conversations with Yale students, such as asking to be referred to simply as people, rather than as prisoners or inmates. Ronald found that Yale students reciprocated, bringing curiosity and the desire to really understand who the individuals in PACT were. Because of these dynamic, respectful conversations, Ronald always felt like he was not in prison when he was in the Verbal Arena, “During those meetings, I escaped.”

The PACT students, the Yale Law coordinators, and the supervising professor all recognized a shared duty to make sure the Verbal Arena lasted—as it has done—so mostly the

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law students did not engage with members’ cases. Still, a group of Yale students did support a member of PACT in one rare instance. The case ended up at Second Circuit, where the court reversed his conviction on a closure of the courtroom issue.

Although the students only came to the prison during their three years at Yale, PACT members sought to develop long-lasting relationships with them. At times, Ronald says, the relationships PACT members built with Yale students created connective tissue that led to continued support once the men were released. He remembers that when he got out, he reconnected with Richard Buery, a former Yale student who had become New York City’s deputy mayor; later, Ronald started working with Joanne Page. Although he did not reconnect with most people, he values the lifetime relationship he built with these two people.

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ii. Kenny Inniss’s Experience

Kenny remembers his first visit to the Verbal Arena in 1991 as filled with confusion, because he brought his legal files for his direct appeal, expecting a legal workshop with Yale Law students, but found himself listening to a lecture on the Harlem Renaissance.233 Before the students came in, the members of PACT set up seats in a round circle, skipping a seat, so that when the students entered, they could sit between them. At he was setting up seats, Kenny felt frustrated to hear they would not talk about law, but one of the older guys told him to give it a chance. So he listened as a student from Yale gave a history lesson. “He had been to Africa three times, and he knew everything about the Harlem Renaissance,” Kenny recalls. During the break, Kenny had a sidebar conversation with a student and realized they were both were trying to make the other feel comfortable. He found that rewarding and refreshing and decided to come back.

233 The following section ii. is drawn from the Interview with Kenny Inniss, supra note 4.
Since the program had been around for ten years, Kenny learned that PACT already had coordinators and topics of discussion set for the next seven meetings that semester. So, Kenny started coming to the off-week sessions to review the materials the Yale Law students brought in ahead of time. Over time, Kenny got to contribute to the wish list of topics that the group asked Yale students to find materials on.

As time went on, PACT pursued more workshops that revolved around legal concepts. He remembers looking forward to the times that the students brought a professor to present: one time, he says, they brought in the woman who authored Critical Race Theory, another time a First Amendment expert came in, and another time a professor lectured on the way the media manipulates people’s minds. In one of Kenny’s favorite sessions, a professor gave a brief overview of the amendments that were most applicable to people who were incarcerated. At PACT’s request, students also started workshops on writing legislation so PACT members would know how to write law. All those workshops stuck with Kenny and helped him develop his legal thinking skills as he worked in the law library.

Kenny’s favorite thing about the Verbal Arena was that the law students weren’t preaching: “Instead, we got to have a conversation as equals.” It made him feel more confident that he could delve into a topic with the most prestigious law students in the world and sit right next to people he knew would be movers and shakers. “I got to sit next to Cory Booker when he was a Yale Law student!” he recalls. Kenny found he learned so much, even when he just sat and listened. It took his mind off prison. The YLS community made him feel more human, too, because he knew people who go to a prestigious law school wanted to spend time with him inside a dark maximum-security prison, and go through all the rigamarole to get in. Some
members of PACT were not getting other visits, so the students reminded them that people valued them.

He also felt like this exchange changed the cultural consciousness Yale students brought into the outside world about people in prison. Kenny hoped that, as leaders, Yale alumni would lobby on behalf of incarcerated people and challenge people’s stereotypes, helping the outside world see that incarcerated people have a past, but many want to learn and deserve a second chance.

Although Kenny found the Verbal Arena freeing, those relationships came with a cost: PACT members faced backlash from the guards for those relationships. The guards did not like that the men got to be part of this prestigious program, he says, so officers targeted the members whenever the Yale students planned to visit.

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iii. José Saldaña’s Experience

Getting to be a part of the Verbal Arena allowed PACT members to develop a relationship that is almost unheard of within a prison system, so the men value it deeply. PACT saw prisons as designed to isolate those inside them from the world, to restrict who they can communicate with and even what they write. So, PACT’s ability to engage in discussions with youth was special. From studying movements, José Saldaña recalls, the group had learned that youth can generate mass change. Many Yale Law students were really involved in changing the world in ways that were foreign to PACT, so those conversations expanded the members’ minds. Growing up in Spanish Harlem, José did not know anyone who was concerned about climate

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234 The following section iii. is drawn from the interview with José Saldaña, supra note 3.
change, because his peers were worried about being shot. But when he spoke about climate change with passionate law students, he found those discussions enlightening and valuable.

José always wished those meetings lasted longer and happened more frequently. Each time the members got into a deep conversation; it was already time to go. Sometimes someone from the last meeting could not make it, and members had to wait weeks to see them. His sentiment is especially acute now, as for the past two years, Yale Law students have not been able to visit Green Haven, and these special exchanges have been halted.
f. PACT’s Legal and Political Work

Throughout the decades, PACT members have been leaders in legal work inside Green Haven. Many members have worked as litigators in the law library, and some, like Mr. Benjamin Smalls have completed paralegal courses.235

Within the group, they studied countless cases and statutes.237 Members have used this training to support peers in the prison with appeals, bring civil rights litigation, engage in legislative advocacy, convince loved ones to vote, liaise with the prison about issues, and engage in peacekeeping in the prison.238 Once released, PACT members like José Saldaña have used this training to keep pushing New York State to change the laws impacting incarcerated people.239

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236 Vimeo: Project for A Calculated Transition, supra note 211.
237 See Interview with Kenny Inniss, supra note 4.
238 Id.
239 Interview with José Saldaña, supra note 3.
This training, accompanied by the partnership with Yale Law students, led Kenny Inniss to see PACT as his law school, and think of that time as equipping him with a law degree.240

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i.  Legal Studies

Ronald Day still remembers that soon after joining PACT, one of the group’s members asked him to take the legal research course PACT ran.241 In that course, he learned about different types of law books, how to Shepardize a case, and how to draft a brief. PACT focused on how members could use research skills to help in their own cases first, and then on how they could help others who were wrongfully convicted or received overly harsh sentences. Finally, the group discussed how to bring actions addressing injustices in the criminal legal system. When Ronald completed the legal research course at the top of the class, the PACT leaders asked if he wanted to work at the law library. When he joined, he realized PACT members were leaders in the library, too.

Joining other PACT members in the law library gave Ronald a deeper appreciation for the law. Some of his coworkers consistently followed case law, read journals, and brought a sophisticated analysis, which helped Ronald expand his knowledge about the criminal justice system. Surrounded by PACT members in the law library, for the first time, Ronald had the opportunity to be around people devoted to learning about the law who wanted to be agents for change. It made him think about becoming a lawyer after his transition.

Outside of the library, PACT delved deep into legal studies every other Monday to address new laws restricting incarcerated people’s access to opportunities during the 1990s. On the Mondays that Yale students did not visit, PACT members would discuss initiatives they

240 Interview with Kenny Inniss, supra note 4.
241 The following three paragraphs are drawn from the interview with Ronald Day, supra note 139.
should be involved in and how they could impact their community. They referred back to the “Non-Traditional Approach to Criminal and Social Justice” paper frequently while strategizing about how to enrich the jail community and transform their dehumanizing and traumatizing experience of incarceration. When they ran out of time on Monday evenings, the members found ways to meet in cell blocks together. In those meetings, Ronald says, he almost forgot he was in prison.

Kenny remembers the Monday legal meetings as invigorating and filled with assignments from PACT’s leadership.242 In many meetings, the leaders recapped the Verbal Arena readings for the following week and pushed members to write papers reflecting on the subject. Other times, especially when Yale students provided PACT with handouts about the law, the members would come to Monday sessions having studied the handouts and hold workshops aimed at understanding that law. PACT emphasized that since everyone was at Green Haven because the state said they broke a law, they ought to know the law. So, while the meetings did not deal with the members’ cases—in fact, it was against the rules to present one’s case—they often focused on topics that would be relevant to their cases. For example, PACT learned more about how to file civil rights petitions, and how to bring challenges about Brady material, Rosario material, the First Amendment, and other amendments. Since a lot of men were employed in the law library, sometimes they would share their expertise through lectures on criminal law and procedures.

Throughout the 1990s, as tough-on-crime political rhetoric swept the nation, PACT used Monday meetings to follow federal and state legal developments that affected them. When, in 1994, Congress passed the Violent Crime Control and Law Enforcement Act (“1994 Crime Bill”), which banned incarcerated students from receiving Pell grants, PACT recognized this as

242 This paragraph and the following paragraph are drawn from the interview with Kenny Inniss, supra note 4.

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\textit{ii. Legal Self-Education as Resistance}

eliminations went into effect. Then, in 1996 Congress passed the Prison Litigation Reform Act (“PLRA”), which made it harder for jailhouse lawyers to file lawsuits about conditions of confinement in federal court, effectively denying incarcerated people equal access to the courts. PACT studied the laws’ exhaustion requirements, physical injury requirements, and restriction on court remedies for civil rights abuses in prisons. That same year Congress passed AEDPA, preventing incarcerated people from filing habeas corpus cases after one year, so PACT started running workshops about how to file petitions quickly. When Congress passed the Adoption and Safe Families Act (“ASFA”) the next year, PACT held a workshop on how incarcerated people could lose parental rights in little over a year, and the impact it had on women.

PACT’s original leaders, who had moved forward from Attica by focusing on preparing for release, seeking relief in the courts, and pursuing education, were left to regroup to challenge these inhumane conditions, as cruel new laws undermined the gains they had made since Attica. PACT litigators responded to these restrictions by building their internal education infrastructure to replace the external assistance they lost, and by learning what suits they could still bring. They ran workshops discussing how the AEDPA limited the timeline for filing federal habeas corpus petitions. PACT’s emphasis on education helped Kenny figure out what he wanted to do with the rest of his life, and he continues to work as an educator with incarcerated students today.

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249 Interview with José Saldaña, supra note 3.
254 Interview with Kenny Inniss, supra note 4.
iii. Jailhouse Lawyering

As mentioned above, PACT members have historically worked as jailhouse lawyers in the law library. They support people throughout Green Haven in filing appeals, including federal habeas corpus appeals, and in filing prisoners’ rights cases. They also support peers in preparing for grievance hearings and parole hearings. Most of the cases they assist their community with are cases where incarcerated people have no right to representation. So, as Mr. Smalls, one of PACT’s jailhouse lawyers put it, the litigators have to take on the “herculean task” of learning legalese and using their access to law libraries to support people who have no other representation in disciplinary matters or parole hearings.²⁵⁶ Though reporters Tom Robbins, Michael Schwirtz, and Michael Winerip commented, incarcerated people “virtually never prevail in prison hearings, which are often overseen by uniformed staff members,”²⁵⁷ PACT members work tirelessly to tip those impossible scales in their community’s favor.

In Kenny’s memory,²⁵⁸ PACT was the law firm at Green Haven. Since the members worked in the law library, and everybody had to visit the law library, most people who were not involved in PACT consulted PACT on legal questions. The more PACT helped men learn about the law they had been convicted under, Kenny says, “the more people would say, ‘It wasn’t like that!’” This helped people file stronger appeals. Because of this work, during the 1990s, about half of the conviction reversals in the state came out of Green Haven’s law library. Kenny attributes this success to PACT’s legal workshops and the exchange with Yale Law students.

PACT assigned its members to work on cases, and sometimes used Monday workshops to assign members to work on discretionary appeals. In 1996, when they learned that AEDPA

²⁵⁶ Interview with the late Benjamin Smalls, supra note 151.
²⁵⁷ Robbins, Schwirtz, Winerip, supra note 6, at ¶ 15.
²⁵⁸ The following three paragraphs are drawn from the Interview with Kenny Inniss, supra note 4.
had reduced the period for filing habeas corpus petitions from years to just one year after their direct appeal was exhausted, the men felt like they had had their legs cut out from underneath them. Most had been sentenced to 25-to-life, so habeas was the last opportunity to get some type of remedy from the courts. Instead of despairing, PACT broke into teams and focused on getting each member’s habeas corpus petition into court. They spent multiple workshops on AEDPA, reviewed each other’s filings, and assisted each other in submitting cases.

During the 1990s, PACT also brought class actions to combat the state’s cutting of services at the height of public demonization of incarcerated people. Even before the government took Pell Grants away, New York stopped allowing free mail; started increasing the price of commissary; cut pay for prison jobs; and started charging $25 for a GED, which had previously been free. PACT saw these cuts as tied to public demonization of Black and Latinx people during the crack era. They had watched this shift in public sentiment—from the post-Attica activists who had worried about prison conditions to a public that thought incarcerated people should not have the opportunity to complete a high school education, because they were the worst people in the world. In response, PACT decided to use their workshops to plan class actions. After one of the PACT instructors showed the members how to prepare a class action, the members broke down into three-man groups. Each group formulated a class action, and over multiple sessions, they workedshopped them. After tireless effort, PACT submitted all of them to a court, which consolidated the class actions. As a result of this effort, a prestigious law firm picked it up. In the end, PACT lost every challenge except for one: New York repealed the $25 charge for GEDs and made them free again. Because of their win, GEDs are still free in New York.
On top of filing cases, Ronald remembers PACT’s jailhouse lawyers taking on a mentoring role in the law library.\textsuperscript{259} As they helped people work on their cases, they pushed people with long sentences to take advantage of classes. They also tried to impart legal knowledge in addition to working on the cases themselves, because they wanted to make sure people understood the legal ramifications of their own cases.

In José Saldaña’s memory,\textsuperscript{260} PACT focused so much on litigation in part because they wanted to organize to stop the prison administration from harming the prison community, but they wanted to do so without incurring wrath that would affect that whole community. They felt that organizing mass protests of inhumane conditions did more harm than good, José recalls, because the administration came down hard on everybody. While they found it unjust, PACT decided not to organize demonstrations, even when guards beat somebody up, because although the whole community felt that pain, doing so would mean the prison would send people to the box for years, or transfer people and cut their family time. PACT also knew they would be held accountable for any demonstration because of their open legal activism. Every time a demonstration happened, José remembers, the prison investigated him and held PACT members accountable. So, PACT tried to fight brutality in a legal way. Sometimes legal battles still led PACT to make sacrifices, and members got sent to punitive solitary confinement. Nevertheless, José remembers how PACT members like Benjamin Smalls and Delroy Thorpe remained committed to jailhouse lawyering because they knew it would help improve conditions.

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\textsuperscript{259} This paragraph is drawn from the interview with Ronald Day, supra note 139.

\textsuperscript{260} This paragraph is drawn from the interview with José Saldaña, supra note 3.
iv. Legislative Advocacy

In addition to bringing civil suits, PACT engaged in legislative advocacy.\(^{261}\) During workshops, the group’s leaders taught members about New York State’s political system. They talked about how many senators and assembly members New York had, and the districts they represented. They learned about what it means to have a majority and a super majority and figured out whether the Democrats or Republicans had control in each district. Then, members encouraged their families to get in contact with their congresspeople, and at times asked them lobby in Albany or protest on the outside.

Kenny remembers trying to rewrite and change laws.\(^{262}\) PACT conducted research and tried to present evidence to community organizations and legislators. For example, the group wrote to legislators asking them to challenge New York’s decision to use Housing and Urban Development Funds meant for the New York City Housing Authority to build prisons. When PACT identified that New York was misusing housing funds to build prisons the state did not need in the 1990s, they identified a contributing factor to the city’s ongoing homelessness crisis.

From the 1970s through the 1990s, PACT organized an annual legislative conference during Black History Month in collaboration with the Green Haven branches of groups such as the NAACP, Hispanics United for Progress, Veterans Associations, Caribbean African United, and the JCs. Hosted in the visiting room, these conferences brought together outside community organizations, incarcerated people the prison administration, the Department of Corrections administration, and legislators. During the 1990s, Yale Law students became a part of that conference. Ronald Day remembers members of the legislature and judges coming in to talk and

\(^{261}\) This paragraph is drawn from the interview with José Saldaña, supra note 3.

\(^{262}\) The following six paragraphs are drawn from the interview with Kenny Inniss, supra note 4, though a few points are cited to the interview with Ronald Day, supra note 139.
present creative ideas about prison reform.\textsuperscript{263} This was a huge innovative process, and Ronald says that he has not seen anything like it anywhere else.\textsuperscript{264} In this forum, PACT would discuss policy and push for programmatic change.

Before the conferences, PACT would discuss what legal campaign to pursue. They would start out by putting ideas on the board. Kenny remembers one meeting where they talked about ending prison construction, expanding education, and pursuing incarcerated people’s right to vote. Then each member would share their analysis of which issue to pursue in the conference, and the group would choose an issue to prioritize.

One year, in the 1990s, PACT advocated for a “good time” bill, where people in prison could earn time off their sentence. They chose to pursue this topic because they recognized not everyone could be in PACT and wanted to support a cause that would benefit the overall community of roughly 2,200 people at Green Haven. The bill would allow men to earn one month off their sentence every three months, and for many men, that would add up over years. PACT saw this bill as incorporating an incentive for everybody in the prison to behave better, because everyone wanted to earn time off their sentence. During the conference, PACT emphasized that this bill would give men the opportunity to demonstrate their skills and would lead to less violence and less misbehavior, changing the way people approached their time in prison. Their effort failed that year—it was the height of the war on drugs, when the public characterized Black men with limited marketable skills as “super predators” and George Pataki won the governor’s race on a tough-on-crime platform.

As PACT continued advocating for change, they doubled down on explaining that they were not asking anybody to exonerate them. Ronald remembers that PACT started conferences

\textsuperscript{263} Interview with Ronald Day, supra note 139.
\textsuperscript{264} Id.
in the late 1990s by stating, “We accept responsibility for the decisions we’ve made, for the crimes that we’ve committed, and for the harm that we have done to our communities.”

During Kenny’s time in PACT, the members also advocated for a moratorium against prison construction, incarcerated people’s right to vote, and the restoration of Pell grants. PACT calculated that every new maximum-security prison that was built would tack on five years to average sentences, because there would be space to keep everyone longer.

Eventually, the administration stopped allowing legislative conferences, but for years, they gave PACT a chance to create reform. While most of the campaigns did not lead to immediate success, Kenny looks at the recent restoration of Pell grants and is glad he was able to participate in campaigns for changes that have finally borne fruit decades later.

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v. Organizing Within the Prison and Green Haven’s Y2K Backlash Against PACT

Ronald remembers PACT being an organizational leader within the prison that had power to influence the community and the administration. Through the group, he learned how to organize, how to build power in numbers, and how to agree on unified ideas that could make the prison a better place. Though the prison mostly acted as a human warehouse, PACT used their limited power to push the administration to constrain some of the negative things they imposed.

In 2000, however, the prison subjected PACT to the biggest blow to their stability yet. By 1999, as parole laws left fewer people with the hope of release in New York and PLRA led courts to throw out civil rights cases, incarcerated activists in New York prisons saw that the

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265 Id.
266 Id.
267 Delaney & Wachendorfer, supra note 245.
268 The following two paragraphs are drawn from the interview with Ronald Day, supra note 139.
tactics they had adopted no longer worked and started to plan a strike. Men in Sing wrote a manifesto calling for people in all seventy prisons to refuse to cook, mop, or perform their jobs on January 1, 2000 in response to the new policies, which made parole next to impossible. The manifesto highlighted the slave-like conditions in prisons and pointed out that the new laws meant incarcerated people did not have much “to gain by performing sub-minimum wage work, or trying to cooperate with the system in any other way.” One incarcerated man, Jason Nicholas, commented in 1999, “The feeling is that people died at Attica for what we had, for the so-called privileges we’re losing.” In the lead up the Y2K strikes, Green Haven sent over 40 activists to other prisons in an effort to diffuse organizing. Kenny Inniss was one of them.

The backlash from Green Haven’s prison administration’s continued once the Y2K strike started, and prison officials blamed founders of the New Prison Movement. José remembers that staff put Larry White and other members of the Resurrection Study Group in the box, alleging they had organized the statewide strike. Then the prison made the Resurrection Studies Group’s written material contraband, so all the therapeutic classes had to be shared by word of mouth. It may have been at this time that PACT became the leader of personal development classes within the prison.

This experience reminded PACT how the administration could harm them by preventing them from putting their heads together and that the program could be stripped from them at a moment’s notice. Staff members targeted them and their education programs going forward, so PACT worked to keep the program running by showing the staff that they made the prison better
for everyone. The administration looked to PACT to help minimize violence in the community and negotiate with their peers. They acted as peacekeepers, which helped them get more done.276

276 Interview with Kenny Inniss, supra note 4.
g. PACT Continues Carrying Forward the New Prison Movement

Reflecting on PACT, former members value the impact the organization had on the New Prison Movement, on themselves, and on the people who carry the program forward. PACT’s members experienced, identified, and wrote about mass incarceration and its roots in racial injustice long before most academics. 277 PACT changed thousands of incarcerated men’s lives—it was their university. 278 Looking back, Kenny Inniss 279 feels grateful he got to be part of a movement that tried to empower its members to come to terms with themselves and to learn about their situation so that they could help themselves and be more helpful to others. PACT taught him he did not have to fight with his hands. He could fight through transformative self-reflection, finding his place in the struggle, and trying to change the law. As revolutionaries, the group’s members learned to write the laws they needed to pass to move forward PACT’s agenda. They did the best they could do with what they had, and that was the best learning experience. “We never knew when we would get to the finish line with our initiatives,” Kenny says, “But the fact that I got to carry the torch and pass it on to other guys who ran with it as best as they could makes me smile.” Ronald Day sees PACT’s continued work as a testament to perseverance and feels proud to see new members carrying on that legacy of the folks who have passed away, like his friends Chill—Charles Hamilton—and Jafar, who led PACT when he was a member. 280

Former PACT members are community leaders working to uproot New York’s legacy of racism in the criminal legal system. José Saldaña now runs Release Aging People in Prison (RAPP), which promotes bills to help elderly people get out of prison. 281 He came to this work

277 Interview with James Forman, Jr., Professor of Law, Yale Law School (2019).
278 See interview with José Saldaña, supra note 3.
279 The following five sentences are drawn from the interview with Kenny Inniss, supra note 4.
280 Interview with Ronald Day, supra note 139.
281 The following five sentences are drawn from the interview with José Saldaña, supra note 3.
after seeing many mentors pass away in their late 50s in prison and worrying that he would join them. Three years before his release, José connected with Mujahid Farid, one of the co-founders of RAPP, to promote a bill that would replace the New York Parole Board’s members from law enforcement who did not accept that people convicted of violent crimes can transform their lives. With RAPP’s help José started suing the board in court every time it denied José parole, contacted lawmakers, and alleged that the board had denied him a “fair and impartial hearing.” After years of efforts, José won release from the parole board. When Mujahid Farid passed shortly after, José became RAPP’s Director.

Meanwhile, Ronald Day282 has become a professor and is Vice President of Programs for The Fortune Society, one of the biggest reentry organizations in New York, where he works with Joanne Page. He has a Ph.D., and he oversees employment services and a good portion of the organization’s reentry services. As a reentry specialist for the John Jay College Institute for Justice and Opportunity, Kenny Inniss now provides academic reentry planning and writes discharge plans for people in a credit-bearing program at Otisville Prison.283 Anthony Dixon became Director of Community Engagement for the Parole Preparation Project284 and Roy Bolus, released in 2019, now teaches at Yale.285 Many others continue this fight in New York City.

These leaders demonstrated that together they could empower themselves to take control of their situation and change it so that it benefits them as a community. Thinking back on

282 The following two sentences are drawn from interview with Ronald Day, supra note 139.
283 The following two sentences are drawn from Interview with Kenny Inniss, supra note 4.
284 Interview with Anthony Dixon, Director of Community Engagement, Parole Preparation Project (2019).
285 E-mail from Roy ‘Gyasi’ Bolus, Lecturer, Yale University, to Eleanor Roberts, Student, Yale Law School (Nov. 23, 2021, 9:46 PM).
PACT’s discussions, José is not surprised that those men have grown into the community leaders they are today.²⁸⁶

²⁸⁶ Interview with José Saldaña, supra note 3.
V. The PACT-YLS Partnership: Forty Years of Community

This chapter draws on oral history contributions from Yale Law alumni Mark Levin, Jonathan Glater, Jean Giles, Bessie Dewar, Ellie Sutton, Julianne Prescop, Dan Correa, Ryan Cooper, Corey Guilmette, and Lexie Perloff-Giles, as well as interviews with James Forman, Jr., and Shiv Rawal, which were conducted for a documentary about PACT. Mark Levin was co-director of the Green Haven Prison Project in 1982 and 1983 and is now a professor of law at the University of Hawai‘i at Mānoa William S. Richardson School of Law. James Forman, Jr., participated in Green Haven before graduating in 1992 and is now the J. Skelly Wright Professor of Law at Yale Law School. Jonathan Glater is a law professor at UC Berkeley Law, where he teaches criminal law, and a 1998 graduate of Yale Law. Jean Giles, YLS class of 1999, is Assistant Federal Defender in the Capital Unit of the Federal Defender for the Southern District of Indiana. Bessie Dewar was co-director of the Green Haven Prison Project in 2004 through 2005; today she is the Solicitor General for Massachusetts. Ellie Sutton, who became co-director in 2005, is now a partner at Quinn Emanuel Urquhart & Sullivan, LLP. After Julianne Prescop graduated in 2008, PACT motivated her to join Los Angeles County Public Defenders, where she is now Deputy Public Defender. Dan Correa became co-director in 2011 and is the Founder of the Day One Project and a research affiliate at Stanford University. Ryan Cooper, who began his tenure as co-director in 2013, is an attorney for the Consumer Finance Protection Bureau. After becoming co-director in 2014, Corey Guilmette went on to represent families of people killed by law enforcement in civil rights suits. Lexie Perloff-Giles graduated in 2017 and is an associate at Gibson, Dunn & Crutcher. Shiv Rawal served as co-director for two years, graduated in 2021, and is now a clerk in the New York Court of Appeals. Because these students got to know PACT at different times, their stories are told in chronological order.
a. The PACT-YLS Partnership into the 1980s

i. *Mark Levin’s History*[^289]

Mark Levin still remembers the first time he went to Green Haven, while Chris Stone led the group. He was a scrawny white kid from privileged suburbs in New Jersey, and the first person who introduced himself, Mustafa Malik, had been a leader in the Attica Uprising. Mark was blown away. He remembers the meetings being joyous. Although the three-hour round-trip was time-consuming, Mark says, “I always got more out of it than the trip took out of me.” As he got to know the PACT men, he learned that most of them faced life sentences received under the Rockefeller drug laws. He remembers the conversations at Green Haven as being decades ahead of the current public consciousness in terms of how they discussed systemic racism and the connections between Jim Crow, slavery, and prison. He felt that those conversations helped students like him, many who came from privileged backgrounds, witness the system, and appreciate the basic humanity of incarcerated students who were serving life. Though Mark didn't make criminal justice the center of his career as a law professor, the relationships he developed with PACT members have informed his work and teaching with a significant human rights angle. Mark has published comparative pieces in English and Japanese drawing comparison between the two systems and regularly teaches about criminal justice in his Japanese law classes. The lessons also underlie Mark's community involvement including marching in support of BLM and sign-waving for progressive Honolulu prosecutor candidate Jacquie Esser in 2020.

[^289]: The following section *i.* is drawn from the e-mail from Mark Levin, Professor of Law, University of Hawai‘i at Mānoa William S. Richardson School of Law to Shiv Rawal, Rebecca Lewis, Eleanor Roberts, Students, Yale Law School (Jul. 13, 2020, 6:14 PM).
After Joanne Page and Christopher Stone graduated, Chris chose Mark Levin and his classmate Jeffery Robinson to take over as co-directors in 1982 and 1983. Mark felt honored to be chosen and lucky to have Jeff by his side: “It took two students to pick up what Chris did single-handedly,” he recalls. Together, they dove into organizing transportation, coordinating with the prison administration, and fighting for the program to continue. They recruited other students to the group by posting typewritten flyers on the law school hallway bulletin board. The two made sure the group always stopped for pizza on the drive home, so they could have dinner while reflecting on the Verbal Arena. Mark smiles as he talks about that partnership. “Jeff was a rockstar. He went on to serve as the Associate Director-Counsel for the NAACP Legal Defense and Education Fund (LDF) for five years and he's now a leading litigator at Lewis Baach Kaufman Middlemass in Washington D.C.”
GREENHAVEN PROJECT

The Greenhaven Prison Project is a part of the Urban Legal Workshop of Yale Law School. Through this program, law students and anyone wishing to join us, participate in an on-going legal issues class with inmates at Greenhaven Prison, in Stormville NY. Every other Monday, we leave New Haven at 4PM and drive up for the two and 1/2 hour discussion group. Following a dinner stop on the way back, where we talk over our experience, we generally return to New Haven around 11:30 PM. The general nature of discussions involves the law, prison life, and the politics of the law as it affects oppressed minority groups in our country. Furthermore, aside from legal issues, the inmates are also interested in opening up on-going discussion sessions on anything of mutual interest, most particularly music, literature, and drama.

Anyone is welcome to join us once or regularly. We are limited in the number of persons that we may bring, and preference will be given to law students. It is unlikely that you will be closed out however. Also, we need to know a week in advance, in order to call up names to the prison for clearance.

The program is an unique and exciting opportunity to meet and talk with a group of persons society generally hides away. However, it is important that participants have a degree of maturity sufficient to deal with the seriousness of the prison environment.

Mark Levin
Jeff Robinson 436-2210

Recruitment Flyer from 1983
One of Mark’s favorite memories is of a day-long symposium in April 1983 when PACT brought in Yale students and speakers to celebrate PACT’s work, a tradition that continued until the beginning of the pandemic in 2020. 290 That year, Professor Drew S. Days III came with the Yale students. Professor Days, who went on to act as Solicitor General of the United States, had already led the federal government's civil rights division at DOJ; while there, he oversaw *Ruiz v. Estelle*, 550 F.2d 23 (1980) a case brought over abusive conditions in Texas prisons that led to what Robert Chase describes as “the largest and longest civil rights trial...at that point.” 291 Mark still returns to that experience—spending time with the man whose work led to a mandate to oversee the entire Texas state prison system and getting to enjoy a full day with Mustafa and other members. Looking back, Mark says, “I feel so lucky I got to learn from PACT.”

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290 Eleanor Roberts’ recollection.
291 CHASE, supra note 5, at 2.
b. The 1990s: Thriving Partnership & Waning Criminal Law Interest

During the 1990s, society’s focus on demonizing incarcerated people and a wave of laws restricting their rights—including the 1994 Crime Bill, ASFA, PLRA, and AEDPA—led fewer Yale Law students to pursue careers in criminal law. Still, the Green Haven Prison Project maintained a thriving membership at Yale Law School, where PACT reformed the way students thought about incarcerated people.

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i. James Forman, Jr.’s History

By the 1990s, James Forman, Jr., recalls, many students who joined the Green Haven Prison Project came in with negative preconceptions about incarcerated people, due to the rhetoric about super-predators that had swept the media. When James Forman, Jr., joined as first year law student, in or around 1990, the first meeting demolished his stereotypes about people in prison. That evening, he recalls, the group talked about the Thirteenth Amendment. When one of the PACT men pointed out that the Thirteenth Amendment exempted people convicted of crimes, and the law students did not know what he was talking about. So, the members of PACT started teaching the law students about the reconstruction amendments, sharing a whole different perspective than the students got in Constitutional Law at Yale. Twenty-five years before the film Thirteenth brought this conversation into the public eye, Professor Forman says, PACT gave a master class in constitutional law to Yale Law students. “These men were brilliant, well-read, and learned,” he recalls. Every time he walked into those meetings, Professor Forman found that the men had so much to offer to him and the world. This showed him one of our system’s most dramatic dysfunctions: that our society locks up so many people who have so much to offer.

292 The following section i. is drawn from the interview with James Forman, Jr., supra note 272.
Despite the paucity of Yale Law students interested in criminal defense at this time, James Forman, Jr., recognized the ties between civil rights, racial justice, and incarceration. This recognition led him to work as a public defender in Washington D.C.; start a charter school; and, eventually, to become a criminal law professor and renowned author.

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ii. *Jonathan Glater’s History*\(^{293}\)

By the mid-1990s, the Green Haven Prison Project had a reputation around Yale Law for offering a life-changing experience, Jonathan Glater recalls. Jonathan joined in 1995, after an upperclassman told him it was the most meaningful part of law school. He knew nothing about the criminal justice system, but saw the Green Haven Prison Project as an opportunity to speak with people who were experiencing the harshest power of the state directly.

Jonathan remembers the Verbal Arena well. Although the number of YLS students in the group typically dwindled from twenty students to ten over the course of each semester, he remained a regular, visiting the twenty to thirty PACT members every other Monday. His recollection lines up with Kenny Inniss’s: the group would sit in a circle, with PACT and Yale students alternating so they could have side conversations during the group discussion. This was when Ronald Day’s friend Chill—Charles Hamilton—was the main Verbal Arena coordinator.

During consistently respectful, free-flowing conversations, the group’s members engaged in a shared questioning about the criminal justice system. The students, who had learned about prisons in school, wanted to learn from people who experienced the way the institutions worked, while PACT members wanted to learn about the justifications for what the institutions were doing to them. Together they tried to parse the ways criminal law enforcement works, and the

\(^{293}\) The following section *ii.* is drawn from the interview with Jonathan Glater, Law Professor, University of California, Los Angeles, by Sarah Nathan and Thomas Ritz (Apr. 2, 2021), shorturl.at/kxJU5.
reasons behind it. Chill often brought the topic back to the importance of helping people in prison to readjust when they get out. “Those conversations helped me understand alternative ways of thinking about how to respond to violence,” Jonathan says.

Learning from PACT shaped Jonathan’s perception of Yale and created a bond among the Green Haven members. He noticed that on the drive up, students talked about whatever they were working on at the law school. On the way back, though, they bonded instead over the impressions of the conversations they had at the prison, which would leave them sobered. Jonathan often spent those drives thinking about how the concrete obstacles that the men in PACT coped with were on a different scale than his worries.

During his second year, Jonathan joined classmates Jeanette Melendez and Bacardi Jackson, both members of the class of 1998, as co-director. The three of them convinced two professors to visit the prison to discuss Fourth Amendment searches and seizures and criminal procedure. During those visits, he recalls, PACT members showed a kind of courage that law students often lacked: they pushed back and questioned professors directly in a way he never saw in class at YLS, even when students had similar concerns.

Today, Jonathan teaches criminal law, and he says PACT shaped how he tries to make his students think about the experience of incarceration. He teaches a case about someone who steals a little over $1,000 worth of golf clubs and is sentenced to decades in prison because it is a three strikes offense. Some of his students do not bat an eye, so he stresses that this is longer than they have been alive. Though he admits he cannot fathom the full experience of incarceration, he visualizes the trapped hallways he would walk down to get to the meeting room and prioritizes making the experience of being inside a prison real to his students.

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iii. Jean Giles’s History

Jean Giles showed up to law school in 1996 knowing she wanted to work in capital defense. Yale did not have a criminal defense clinic, so she was drawn to Green Haven. She joined the group in her first year, while Jonathan Glater was co-director. She remembers the program being popular and spreading via word of mouth, drawing in thirty to forty students each year, even if only around twelve came to any given session. A lot of students interested in public interest ended up being involved in Green Haven, she says, but few had an interest in pursuing criminal defense careers. Still, the group was so admired that even a non-law student capital defender who was married to a Yale professor joined.

Before sessions, she recalls, the group would read an article that the PACT leaders had chosen. When they visited the prison, a couple PACT members moderated a discussion. As they sat in a circle, everyone shared their experiences. PACT members shared different experiences than law students, and Jean felt lucky to have the chance to learn together in a room with people she would not otherwise know. She cherished the fact that the program did not involve representation, because it allowed everyone to interact in non-defined relationships. “PACT members were not clients,” she says. “They took charge.” Seeing this made Jean sad that PACT members had so much potential they had not been able to realize before they were incarcerated. She hoped that they would have the opportunity to leave and accomplish their goals.

After she graduated in 1999, this experience shaped her approach to clients as a capital defender. “PACT taught me to think about how clients I represent have so much else going on in their life at the prison,” she says.

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294 The following section iii. is drawn from the interview with Jean Giles, Assistant Federal Defender in the Capital Unit, Federal Defender for the Southern District of Indiana, by Eleanor Roberts and Alex Fay (Mar. 19, 2021), shorturl.at/kxJU5.
c. PACT-YLS in the 2000s

After the prison administration attacked PACT in response to Y2K strikes by incarcerated workers, the PACT-Yale partnership shrunk, and the community faced new restrictions as new millennium began.295 Students navigated these barriers with the help of Yale Law Professor Brett Dignam, who became the faculty sponsor for the Green Haven Prison Project after creating a prison litigation clinic.296 Thanks to efforts by Professor Dignam, the students, and PACT, the Verbal Arena remained a space for Yale students and pro se litigators to build relationships.

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i. Bessie Dewar’s History297

In 2003, Bessie Dewar joined the Green Haven Prison Project because she had volunteered as a tutor for four years in Harvard’s prison education program at Suffolk County House of Corrections. She remembers overwhelming interest from her peers—some wanted to join the group’s long-running dialogue, others came from Brett Dignam’s prison litigation clinic and wanted to do public defense, and others wanted to be prosecutors and valued getting to know people in prison. Still, only about five to nine Yale Law students went to each visit, and only about fifteen PACT members attended the meetings. Though the prison felt bleak—students walked through double-barred doors and down cold long cinderblock hallways to get to PACT—Bessie remembers the large, cold, cinderblock room in which they met feeling brighter, thanks to the warmth of the atmosphere. After an hour and a half of talking, she recalls, they ended each session with a coffee hour where everyone mingled.

295 Interview with Ellie Sutton, Partner, Quinn Emanuel Urquhart & Sullivan, LLP, by Elsa Hardy and Mila Reed-Guevara (Apr. 7, 2021), shorturl.at/kxJU5.
296 Interview with Bessie Dewar, supra note 216.
297 The following section i. is drawn from the interview with Bessie Dewar, supra note 216.
Having tutored in a prison before, Bessie found that the biggest difference was that the law students and PACT interacted as equals. PACT members and Yale students took turns leading the discussion: “Everyone came with different knowledge, and it was a sort of intellectual adventure together, as opposed to one person supposedly being in the teaching role,” she says. She was floored by the great conversationalists she met in PACT. She was not used to having discussions among such a diverse group, with varied political opinions, ages, races, and backgrounds. Everyone engaged earnestly, really listened to each other, and responded respectfully, while still joking around half the time. PACT made sure to include everyone, especially the people who wanted to be prosecutors and had different views than other students. Big Mike Steely, a PACT member, did this by calling people in so everyone would participate, and the group adopted a practice—as Bessie recalls, suggested by her then-co-director Abby Horn, who is now a public defender—of snapping fingers to indicate agreement or sympathy with statements made by others.

The discussion Bessie remembers best was about same sex marriage. At first, she says, it was a little bit of an uncomfortable topic to discuss—this was in approximately 2003 or 2004, when gay marriage was far less widely accepted than it is now—but Abby led the discussion skillfully. Bessie was not having these challenging conversations at Yale. It was better than the best seminars in law school.

“PACT members consistently knew way more law than the law students,” Bessie says. The jailhouse lawyers spent a lot of their time working on legal cases, so when law students proposed a straightforward legal issue, PACT members would already know so much about it. One time, Bessie mentioned the only criminal case from New York of which she happened to be aware, a case from the 1980s that she had been told raised some novel Fourth Amendment
issues; as soon as she brought it up, to her astonishment, a PACT member named Seth knew the exact case. As he explained to her what the issue had been, his knowledge about law and his intellectual curiosity stuck with her.

When Bessie joined Abby and several others as a co-director in 2004 and started coordinating with PACT leaders, she began to worry that the administration might shut the program down. Not long before she joined, the administration had forced PACT to cease their seminar for a time. PACT’s leaders told her the program could be taken away at any time, so they tried to follow the rules. The men suggested cases they wanted to discuss, and she found articles to send into the prison in advance, but they had to be a little careful about what they chose, because they were concerned that if they sent something too provocative the prison administration would react. The administrators forbade the students and PACT from having any contact outside of meetings.

Bessie had the sense that PACT very much viewed itself as a mission-driven organization that was engaged beyond their partnership with Yale. The more experienced PACT leaders mentored younger men. Though members had long sentences, they focused on preparing themselves to be the best contributors to society they could upon their release. Bessie also remembers PACT’s annual photocopier fundraiser to send school supplies to poor children in New York City.

One of her favorite parts of the partnership was the yearly symposium, during which PACT catered a whole meal to celebrate the partnership. “I had the sense that the PACT members took great pleasure in hosting this special occasion for us, and I felt surrounded by generosity.” she says. At the final meeting with PACT, they presented her with a wooden and gold plaque, thanking her for her service. She felt buoyed by their encouragement even after
leaving the partnership, and even today, she keeps her plaque in the Massachusetts Attorney General's Office. When Bessie clerked for Justice Breyer, she sent a message to PACT, and she heard back: Big Mike was thrilled that she was at the Supreme Court. She wishes Big Mike could see where her PACT plaque is now.

Bessie says that her experiences in PACT gave her the smallest sense of a prison and what it might be like to have a family member in prison. Each time she had to go through security down long, airport-like cordons, where women with underwire bras had humiliating experiences, she would imagine families there. Nevertheless, spending a lot of time in that physical space and having wonderful conversations fully humanized the men as people she cared about deeply, and it pushed her to work at the Public Defender Service in D.C. during her 1L summer. She married someone who went on to become a public defender and remains passionate about criminal justice issues. “Though I like to think I would have cared anyway, I cannot be certain who I would be had I graduated from law school without that experience,” she says.

Bessie took this sense of equal humanity into her clerking, where she saw many extraordinary works of advocacy litigated by pro se incarcerated people. As a clerk on the Supreme Court, she saw a pro se excessive force claim that the district court had dismissed. The petitioner filed an amended complaint fixing the problems and the court dismissed the case again, so the petitioner appealed to the US Court of Appeals, making a point that is supported by law. The court denied the case before the state even had to appeal, but the litigant persisted, filing a petition of certiorari using the right precedent. In the end, Bessie remembers, the Supreme Court summarily reversed. She read many cert petitions written by incarcerated people, and she thinks her conversations with PACT led her to treat such filings with greater respect, knowing so well that they could contain very strong legal arguments.
While she is impressed with longevity of the program, Bessie can't help but also be saddened about the longevity of the terms of the PACT members’ imprisonment. “Many of them most likely made a serious mistake and lost so much from long sentences. I know they have managed to enrich their own and others’ lives in the prison, but if they were on the outside, they could do so much more, as licensed lawyers, counselors, and social workers,” she says. “They are doing that work inside, but it's a loss for our society.”

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ii. Ellie Sutton’s History

When Ellie Sutton was teaching in Louisiana as a young woman, one of her students went to jail, where a guard killed him. Her inability to answer students when they asked her why guards could kill you in jail led Ellie to Yale Law, where she pursued criminal justice reform and joined the Criminal Defense clinic. The experience also motivated her to join Bessie on the long car ride to Green Haven. After her first meeting in 2004, she signed up each week. At the time, the group used a physical sign-up sheet; they could only pick 10 students to go each week because of the prison’s limits on the number of students who could visit. Ellie hated trying to get through security because certain guards would give the students a hard time and tell them their paperwork was wrong, but she felt that was worth it to see the guys.

Getting to know the group while hearing points of view they did not otherwise hear helped PACT and the students to form their own community. She remembers visits to Green Haven where the fifteen men would have deeply read several scholarly articles that the Yale students had mostly skimmed. In Ellie’s recollection, PACT member Mike Steeley set the tone for the sessions by bringing vulnerability and respect. While they talked about law at times, they

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298 The following section ii. is drawn from the interview with Ellie Sutton, supra note 288.
were not allowed to discuss individual cases, and Ellie found those evenings beautiful because they transcended the dynamic of law students talking with incarcerated people only about legal issues. Everyone felt happy that they could connect with people that they did not get to talk to every day and come to care about one another, even while grappling with difficult topics. Since the prison restricted communication, the relationships were temporary, but she felt like part of a community that got handed on from year to year.

While the meetings were supposed to happen every other Monday, throughout Ellie’s time as a co-director in 2006 and 2007, the prison frequently cancelled sessions. One of the counselors who coordinated with Yale would decide to cancel randomly, even though the meetings meant so much to the group. In response to the antipathy they faced, PACT members worked hard to prevent a total shut down. “They had to do everything perfectly because someone at the prison was always looking to take the program away from them,” Ellie says. Although a lot of people wanted to join because they had privileges like meeting with Yale students, PACT became careful about who they let into their group and made a lot of sacrifices to keep the program. Yale students took this fear seriously and limited their visions of expanding the program. PACT and Yale shared a drive to do everything perfectly because they were afraid that otherwise they would never get to see each other again.

Ellie marveled at how PACT built this group despite those challenges. “Everyone shared the vision that this effort went beyond themselves and worked to ensure its continuity,” she recalls. The men recruited each other and elected officers who took on a lot of responsibility. PACT required member attendance and met at other times to run classes, raise money for children, and plan for members’ transitions to the outside. Some older guys told Ellie how they tried to help the younger ones come to peace with living life in prison: “They built their own
community where they shared wisdom and watched out for each other.” Knowing that the PACT-Yale partnership has managed to survive leaves her with an appreciation for PACT’s work and the power of human connection.

Ellie felt sad to say goodbye right before graduating, knowing so many of PACT’s members remained behind bars. There was one man had who joined PACT at the same time she started coming, and she had watched him grow into himself for three years. By her 3L, he had become much more comfortable speaking with Yale students, and he shared that he felt he knew himself better. But when she left, she knew he would be in prison a long time. And though she remembers that some people she knew got out, one member left only to be deported right away.

During Ellie’s last day-long spring symposium, the PACT men gave a presentation in her honor, which made those relationships feel lasting. She remembers how much the meal meant to them—they talked about it for weeks and used their money to buy ice cream, and that year they gave Ellie a plaque, which she hangs in her office at Quinn now. Two years later, in 2009, Ellie got to reconnect with a lot of the same men during an alumni event. When she thinks back on that day, she remembers the human connections. “Everyone felt so excited to get to see each other after time apart,” she says. “It touched me to see that other people cared about keeping the program running.”

Joining this community changed the way Ellie saw people, mistakes, and her work. It continues to color everything she sees on the news, her view of crime, her view of the courts, and her reaction when she hears that someone spent time in jail. She votes based on that experience. When she litigated civil rights class action suits against the NYPD for four years, seeing how the police treated the class members and destroyed evidence disheartened her, but when she felt
exhausted by the hard work, she would return to the PACT members’ faces and names to find the drive to keep going. Those personal connections gave her the strength to keep battling though the largest Fourth Amendment settlement in New York City history. Though she feels helpless to support a friend who is incarcerated in Louisiana, whom the prison banned from commissary because of his dreadlocks, she stays in contact, remembering the importance of human relationships in the face of injustice.

When feeling defeated by how much work remains to vindicate incarcerated people’s rights, Ellie remembers PACT showed her that life is what we make it, no matter where we are. “The men could have given up, but instead they built PACT, mentored each other, and worked on the program every day,” she says. “They did not have control over their situation, but they had control over themselves.”

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iii. Julianne Prescop’s History

During Julianne Prescop’s first semester at Yale Law School in 2006, one of her friends got arrested on drug charges. His arrest motivated her to sign up for Green Haven, even though she had not previously considered criminal justice reform. She joined about a dozen other students who went every other week, and around ten other students who came less frequently. While some were interested in defense or prosecution, most were not interested in criminal justice and just wanted to meet the PACT members. Julianne remembers that Yale Law students looked down on public defenders at the time, saying, “Who would ever want to protect those people? They’re the scum of the earth.” Going to Green Haven challenged that narrative. In her first semester, Julianne only went once, due to clearances, but she went every chance she could

299 The following section iii. is drawn from the interview with Julianne Prescop, Deputy Public Defender, Los Angeles County Public Defenders, by Lily Novak and Aisha Keown-Lang (Feb. 26, 2021), shorturl.at/kxJU5.
during her second semester. Luckily, after that a new prison liaison, Eddie, started being supportive about Yale students coming in, they did not have many issues getting in for the remainder of Julianne’s three years at Yale.

During her first meeting, she remembers that the PACT members who had run the Verbal Arena for more than a decade fostered an environment where everyone felt comfortable. They cultivated trust by asking the Yale students what questions they had and what stereotypes they had so the group could talk though them openly. They also talked about the history of Attica, with the older members sharing more about it. They said their group was the one place in Green Haven that gathered people who could not mix in other parts of the prisons because of their different races, blocks, jobs activities, and cliques. Once members got tapped to be in PACT, all those differences fell away, and they could be open with people whom they would not normally feel safe with. “They had created this space that they let us into, and they cultivated an atmosphere that emphasized giving back.” Julianne says. “They made us feel comfortable, because they had already figured out how to create a welcoming space for themselves.”

Each time Julianne and her fellow students met with the cohort of about twenty PACT members, the group would discuss articles that Yale students and PACT members took turns picking. They mostly tried not to pick criminal justice issues, because PACT members wanted to talk about what was going on outside the prison. Big Mike led riveting discussions by starting with basic prompts. Julianne also appreciated the balance members Jeff and Rah brought to the group: Jeff welcomed them sweetly and made sure everyone participated, while Rah reminded Yale students that going to a fancy law school and not facing the same bad situations that PACT members had had to deal with did not make the students better. That balance of input helped the Yale Law students listen to everybody's perspectives and feel comfortable disagreeing with each
other, in a way that still showed they wanted to learn from everybody else. Julianne kept going back, she says, because the discussions were far better than the ones in class.

After about an hour of talking about articles, the group would mingle for another hour, talking about what was going on in everybody’s life and getting to know each other better over hot chocolate and coffee. She found the amount of joking freeing compared to her experience at Yale, where people worried that what they said would come back to hurt them. Julianne got Rah’s respect by quipping back at him, and she felt the PACT members and Yale students could poke fun at each other while feeling like they were part of the same team. No one felt worried they would get in trouble for the opinion they expressed. This stood in contrast with Yale, where most of the students were careful to try to sound smart, or to avoid saying anything too controversial, which kept conversation at surface-level in class. In the Verbal Arena, people were not afraid to give their opinions, and even if everybody disagreed, everyone felt wanted and valued.

Despite the differences and distance between them, PACT members touched Julianne’s heart in a way that not that many people at Yale did. During her second year, when she was a co-director, she had to take a leave of absence to go home because her mother was passing away. “That experience was devastating,” Julianne says. While she could not go to Green Haven, the other students told PACT what was going on. When she finally returned, she got stopped at security and had to wait in the car. When the students came out at the end of the session, they brought out a beautiful handmade card with a hand-drawn rose on it. Every single PACT member had written something heartfelt to her. Julianne keeps that card in her office at work. It exemplified how the Green Haven Prison Project was about getting to know and learn from each
other, unlike clinics were law students help with cases. “That level of camaraderie would be lost if students had been placed on a pedestal above PACT,” she says.

Green Haven changed Julianne’s career path—she became a public defender even though she had focused on anti-discrimination in housing in law school. At Yale, she learned that while laws prevented discrimination based on race, sex, religion, or national origin, they did not protect people facing discrimination due to criminal convictions. Going to Green Haven, made her realize how those laws were deeply flawed, because they allowed criminality to limit who society views as deserving housing.

While interning at a civil rights firm, Julianne got upset when a lawyer said she did not understand how anyone could defend a rapist. Julianne responded, “Everybody is a person; everybody deserves a chance, and they all deserve people who are willing to fight for them.” One of the staff members told Julianne, “If that's what you really believe you need to become a public defender, because so many people want to work in civil rights but not a lot of highly qualified law students want to be public defenders.” Julianne made the leap to apply for public defender positions because PACT members had changed her mind about who people accused of serious crimes are, and about what they deserve.

Knowing people who had been convicted of crimes—and what happens to them afterwards—motivates Julianne when she’s feeling burnt out with a difficult client. Remembering how PACT created a community, took advantage of resources, and made the best out of their situation, reminds her to treat her clients in the same way because they are capable of more than their cases might suggest.
d. PACT-YLS from 2010-2020: The Resurgence in Criminal Law Focused Students

During the last decade, as pro se litigants continued to fight battles for their humanity and civil rights groups like Black Lives Matter highlighted police brutality, more Yale Law students have started viewing mass incarceration as the most pressing civil rights problem. The societal change in how youth talk about incarceration has led to a resurgence of students joining the program because they want to dedicate their careers to supporting incarcerated people. Meanwhile, an uninterested staff liaison took over at Green Haven in 2010 and Yale students lost their faculty advisor, which set up a decade-long fight to continue visiting as the prison has further restricted the partnership. Professor Forman stepped in as faculty advisor in the latter 2010’s and the prison liaison changed, which expanded student access to the program in 2018 and 2019 until the COVID-19 lockdown in 2020.

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i. Dan Correa’s History

During Dan Correa’s 1L fall, in 2009, he joined the Green Haven Prison Project for the same reason so many people had before him: a 3L told him PACT shaped his outlook more than anything else in law school. When Dan signed up, he remembers joining a group of students who mostly planned to become public defenders or work on criminal justice public policy issues.

In January 2010, once the prison finally processed his clearance, Dan met the PACT men. He remembers that first meeting: when he walked in, and PACT was sitting in a circle with chairs in between them for Yale students, and they welcomed him with positive energy and a ton

300 See generally interview with Corey Guilmette, Legal Services Director, Public Defender Association, by Abigail Bazin and Aisha Keown-Lang (Mar. 5, 2021), shorturl.at/kxJU5.
301 Interview with Julianne Prescop, supra note 292.
302 The following section i. is drawn from the interview with Dan Correa, Founder, The Day One Project, by Sarah Nathan and Justin Cole (Mar. 3, 2021), shorturl.at/kxJU5.
of charisma. After sitting down and making a few jokes, they started talking about forgiveness—when it is appropriate, and when it is not. They had a lively debate. At the end, the PACT members served them instant coffee and hot chocolate while everybody chatted for forty-five minutes. As Dan sees it, the community saw the “Verbal Arena” as an opportunity to transcend the boundaries that separate us in society. “We were all trading ideas as equals in that room,” He says.

Going forward, the meetings had the same equalizing structure as in past years: YLS students and PACT took turns identifying a pre-read, which the students had to send into the prison, and coming up with questions. The PACT members came to each session with well-articulated arguments for certain positions, having studied the pre-read closely. That always astounded the Yale students, who were focused students, but did not bring the preparation PACT did. Dan remembers reading a *New Yorker* article about Obamacare, and PACT members came in with well-articulated ideas about how substantially expanding health care would affect underserved communities. When they mingled afterwards, he remembers learning about PACT members’ hobbies and the books they wanted to read. Through these conversations, Dan learned that PACT members came from diverse backgrounds: some had higher education degrees, and some had never made it to high school. But the group shared this notion that it did not matter who someone was, where they came from, or currently lived. They could meet as equals and go toe to toe.

PACT’s kindness for each other and affection for every Yale student brought those same qualities out in Dan. Older members welcomed new members with encouragement, working on public speaking and coaching them. They had nicknames for all the YLS students and called Dan
Tom Cruise. The warmth in those meetings contrasted with his experiences at Yale Law School, where he never walked into a room of students and felt an overabundance of warmth.

In particular, the day-long end-of-year celebrations exuded warmth. PACT wanted to surprise the Yale students and say thank you, so the members who worked in food service used their sway to make special meals. Dan recalls, “fried chicken, a full breakfast, and then an elaborate lunch, all within the span of like an hour.” The students wanted to show their appreciation, so they stuffed their faces. Meanwhile, PACT rolled in huge speakers and DJed hip hop from the early ‘90s, which was the last time a lot of them were out in society. The group sat at a table and talked all day, and Dan oftentimes connected with people he had not spent much time with yet. After eating, PACT got on stage and performed in a talent show and played games. On those days, Dan had the opportunity to spend a long period reflecting on the affection they all shared. In 2016, when PACT got approval for alumni to come to April event, they sent out a call to Dan, and he returned with ten alumni.

Although the relationship meant so much to PACT and Yale students, they missed many meetings over Dan’s three years because the administration made it hard for students to access the prison. Each student had to get a clearance to join, and prison rules that were nearly impossible to parse barred many from participating, which kept the cohort to about 10 people total. Though the prison claimed to have clear rules, access depend on whoever the program officer liaison was. When they had a motivated liaison, Yale students had better access, but others interpreted the same rules to bar Yale from coming at all, or to allow only certain students to enter. The students had to get an orientation and training from the prison at the beginning of each year; some years the prison said that training carried over for people from prior years, and other times staff barred students, saying the training needed to be redone. The group had to send
a list of all the approved people coming each week, but the staff often claimed that names they had just sent in were not on the list. For a time, the prison did not allow any visitors at all. Some years Yale students did not go frequently, and at times, the prison only allowed in two or three students. Dan remembers those meetings as bittersweet. “We ended up having meaningful conversations, but when I walked in with just one classmate to a room with more than fifteen PACT members excited to see us, I could see they were disappointed that some of their closest friends from the group could not join,” he says.

These challenges motivated Dan to become a co-director so he could work to keep the program going during his four years as a student. This community partnership had been around for a generation, and he shouldered a responsibility that went beyond immediate participation. He hoped to carry the torch forward.

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ii. Ryan Cooper’s History

One of Dan’s co-directors, Cal Soto, encouraged Ryan Cooper to join PACT in 2012. Cal’s passion stood in direct contrast to Ryan’s classmates who were trying to get on the law journal: he cared about the community and not a gold star. Recognizing that he, like a lot of his peers, came from a privileged background and had no experience with incarceration, Ryan joined eight students heading to Green Haven as a 1L, and continued as a co-director during his 2L year.

The prison made Ryan’s role as a co-director challenging—he recruited people, got everyone a TB test, filed the paperwork, and made endless calls with the prison folks to get the right names on the list each week. Staff found the program offensive because the Yale students

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303 The following section ii. is drawn from the interview with Ryan Cooper, Attorney, Consumer Finance Protection Bureau, by Alex Fay and Allison Rabkin Golden (Feb. 13, 2021), shorturl.at/kxJU5.
were not there to educate, but rather to connect with the PACT members as humans. In Ryan’s recollection, the program’s acknowledgment of incarcerated men’s humanity was anathema to the administration and led prison staff to neglect it. Yet, since PACT had political historical importance as a part of a larger constellation of reforms that followed Attica, and because it had a prestigious association with Yale the prison did not outright kill the program. “Instead, they made sure it did not work well,” Ryan says. If a student missed the lone orientation, they could not join the program. Though students tried to share reading materials in advance, the prison did not want them sending in any sort of printed materials.

The prison administration neglected to coordinate with Yale students over readings during the mid-2010s. While they tried to maintain a reading group, oftentimes, when no reading had made it in, the community just talked and listened. PACT leaders moderated, and the law students deferred to them. Even without readings, they had heated debates about current affairs, and sometimes ended up spending a session on someone’s pro se case. Whenever Ryan shared about things going on in his life, PACT members extended support.

Joining a community of men who committed to be kind to one another and empathize under the worst of circumstances changed Ryan’s values. When a PACT member recounted his experience committing a serious crime when he was 13 and the emotional impact it had on him, Ryan admired how he had dedicated himself to self-improvement. As a group, PACT wanted to understand how to be better people and had honest conversations about the insecurities, fears, and aspirations that came with that. Today, he keeps their approach to life in mind and tries to emulate it.

Ryan found the community the Green Haven Prison Project formed freeing. Students who joined often did not feel quite at home at the Law School, and the program did nothing for
their resume. Since there were no faculty advisors to write recommendations or find clerkships, the members stayed because they enjoyed learning together. Ryan built concrete, long-lasting friendships with people who pushed him to join the Criminal Justice Clinic and the Liman practicum, and to pursue a fellowship at a public defender's office after law school.

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iii. Corey Guilmette’s History

When Corey Guilmette signed up for Green Haven as a 1L in 2013, he knew he wanted to work on prisoners’ rights and jumped at the opportunity to learn from men imprisoned at Green Haven. By then, he says, almost every student who joined wanted to work in criminal legal system reform, though they had varied opinions. Some members brought religious motivations, while others did not. Ten to fifteen students tried to go each session, but some weeks, only six made it in. Meanwhile, PACT’s numbers had grown again to include over thirty members of all races and ages, with more than twenty attending any given session, where they drastically outnumbered students.

The community formed immediately, Corey recalls. Soon, PACT gave each student nicknames, calling co-director Nathaniel Robinson, who went on to found Current Affairs, the Professor. PACT shared how the program had impacted their lives, and their long history. Corey, like his peers before him, went all three years because the conversations brought out more authenticity and vulnerability than he was finding at the Law School. At Yale, Corey says he felt competition from his peer and pressure to show up in guarded way, but with PACT, he saw men talk about their emotions, while reflecting about who they were and their growth. He also learned about the law from PACT. The members surprised him: in one conversation, he realized many

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304 The following section iii. is drawn from the interview with Corey Guilmette, supra note 293.
PACT members trusted the police more than the students, because they had family members who were cops. In those moments, PACT said they appreciated getting to speak to people living different lives. Near the end of each session, men from PACT shared about their families, and Corey got a chance to tell them about his own life. Being in community with men who had been in prison for over ten years and faced decades more time, and knowing many of them would die in prison, left Corey feeling a painful weight every time he left the prison, because he knew none of the men could leave with him.

While each session had moments of light-hearted fun, occasionally PACT members would talk about times when members went up for parole and got denied, or about abuse in the prison. These lessons impact Corey’s law practice today. He remembers one PACT member telling him that across prisons in New York, the guards frequently threw men down the stairs. “I thought, ‘Holy shit that’s crazy,’ but didn’t push further,” he recalls. A month later, though, Corey saw a *New York Times* article about that practice, and he panicked, wondering if he should have said something about it. He wished he had had a conversation with the person who shared that about what, if anything, he could do to help. Now, when doing client-facing work, Corey never dismisses concerns because they seem outlandish; instead, he probes further.

The ties he built motivated Corey to become a co-director in 2014. That year, he faced a prison administration that no longer wanted Yale students there. Earlier that year, co-directors Cal Soto and Nate Robinson had filed a grievance against one of the counselors. Though well-founded, it caused political damage. The bureaucracy made it almost impossible to get fingerprinting done, so Corey connected with the former head of the prison system in New York through the Liman Practicum. That man e-mailed the current director of the prison system, but Green Haven still would not let students in. As students scrambled to exact pressure, they started
creating the program’s first-ever alumni list, hoping to find influential alums the members could lean on.

Corey viewed New York’s prison system as “intentionally inaccessible” for volunteers. He now works in Washington, where prison clearances take a week and there is no fingerprinting requirement, but in New York, Corey’s interactions with prison staff were filled with vitriol. Once, during fingerprinting, a correctional officer told him, “These men in here, they're all dogs, and just like dogs, once they taste blood—and these men have tasted blood—they can't get enough. So, like a dog that's tasted blood, you only have one option: you’ve got to put them down.” This interaction shook Corey, who thought, “If that's what this man believes and he's responsible for discipline, he has probably done fucked-up things to the people here.”

On top of the prison administration’s efforts to prevent visits, Corey found Yale Law School unsupportive. One fall, after waiting weeks for an e-mail from the prison, the liaison said students could only get their fingerprints taken at one time, or else they could not join. So, Corey told students they would have to miss class, and a few students missed a 1L Torts class. The next day, Corey got a call from Professor Wishnie who said that if he encouraged students to skip class again, the Law School would suspend him. Because Green Haven did not have a faculty sponsor, he did not have any professor to help him respond to the faculty.

Corey says that getting students into the prison is still one of the most politically challenging things he has ever done, even though he currently represents the families of people killed by the police. Even when they were finally allowed back in, Corey sent a list of cleared volunteers coming each week, and half the time, they arrived only to find that the prison staff told them they were not supposed to be there, leaving them with no choice but to drive back.
When the students finally got back in, they found PACT leaders running the class, and explained why they had not shown up for months. Since students were forbidden from communicating with the PACT members outside of their visits, one time, they showed up after they had not seen anyone for eight months and tried to rebuild their relationship as much as they could. Though the relationships developed over time, anytime they showed up, the group felt happy. The prison staff continued making it near impossible to get readings to PACT. They refused to let Yale bring in a report about the New York State prison system’s lack of response to sexual assault in prison because the content was too sexual. That week, Corey says, they just treated sexual assault as a discussion topic, and PACT moderated.

PACT impressed the Yale students with how much they accomplished despite all the antagonism they faced. Because they had limited internet, they still did legal research on CD-ROMs in 2016, which Yale students had never seen. In addition to litigation, PACT organized around a sentencing reform bill they hated and ran the day-long symposium with Yale students in April. When PACT ran a clothing drive for kids from their neighborhoods, Corey thought, “How the hell did they do that from prison?”

Sometimes, PACT invited Yale students to participate in their Tuesday class on how to counsel people. The prison gave such little counseling support, and many members felt distrustful of the state-provided counselors, so PACT created their own counseling infrastructure, which amazed Corey. Most of the members lived on the honor block, which required them not to face violations for a long period of time—a difficult task, given the capricious rules in the prison. “None of the members should have been in prison, and if they had been free, they would be changemakers and social workers,” Corey says.
PACT taught Corey how to show up in a space filled with people impacted by state violence and recognize their power. He saw the untapped political power that lay within Green Haven, where PACT “did a hundred and ten percent of what they were capable of doing, but the prison suppressed them.” In his work in Washington, Corey sees incarcerated activists like the Concerned Lifers and the Black Prisoners Caucus write legislation, and he feels frustrated by how New York has been able to stymie PACT’s efforts. Nevertheless, he values what PACT taught him about trying one’s best in a repressive environment. Because of PACT, he recognizes the intricate knowledge jailhouse lawyers develop of habeas relief; today he is in the process of hiring a formerly incarcerated attorney.

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iv. Lexie Perloff-Giles History

In the fall of 2014, when Lexie Perloff-Giles started at Yale, Obama had just become the first sitting president to visit a federal prison. She was shocked to learn that an executive had never gone to a federal prison, and she thought that if Obama was going, she should go, too. Though she had heard Green Haven used to be a bigger program, by the time she arrived at YLS, prison restrictions had shrunk it into a niche extra-curricular. That year, the administration did not let any first-year students in, but during her 2L year Lexie was one of three people in her class who got to join, with Corey Guilmette’s help. While peers like Theo Torres wanted to be public defenders, Lexie thought that this would be an important chance to meet people inside of a prison before she pursued work related to museums and journalism instead. During early sessions, she went with Corey, Theo, and Tyler Hill. As the only woman and only person without

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305 The following section iv. is drawn from the interview with Lexie Perloff-Giles, Associate, Gibson, Dunn & Crutcher, by Zoe Masters and Yolanda Bustillo (Mar. 1, 2021), shorturl.at/kxJU5.
public defense interests in the group in 2015, she sometimes felt out of her element compared to the men in the group.

She was intimidated the first time she walked in, knowing she was surrounded by public defense-focused law students. But the PACT men she talked to were interested to hear about her plans, and they shared that they had mixed feelings about all the lawyers they dealt with.

Being the only woman going through security was hard. “I spent a lot of time trying not to feel like an impostor as the only woman,” Lexie says. One time, she felt humiliated when the guard told her she had to take her bra off when it set off the metal detector. Another time, a guard said to her, “I don’t understand why you are going to spend time with those animals, the rapists.” She found this part of visits appalling and shared the PACT members’ wariness of the guards, which built her sense of solidarity with them as peers. Though she would often dread the process of getting to the prison, every time she left, she thought that was the best use of her time all week. As Lexie grew closer with her peers during pizza debriefs after the Verbal Arena, she felt grateful that Green Haven had introduced her to people who ran in different circles at the Law School.

Throughout her second and third years, the prison allowed very few YLS students into the prison and made it difficult for them to get finger-printed for their initial clearance. Usually, only three or four students got admitted to each session. Because the prison refused them entry so many times, Lexie only had the chance to participate in the Verbal Arena during her second two years, and she only went to the April event twice. The Verbal Arena generally had twelve PACT members; because other PACT members had shifts at the law library or tutored on Monday evenings, many more men came to the April event. PACT always acted as hosts to the Yale students, especially during the April symposium when they made special food. So, Lexie and her
peers tried to contribute as well, and in 2016 they organized a reunion event with a group of YLS Green Haven alums, Professor Brett Dignam, and one past PACT member at the law school.

As in other years, PACT and Yale switched off in choosing the topic for the Verbal Arena during Lexie’s time, though PACT generally moderated. PACT built trust with an emotional check-in at the beginning, taking the temperature of the room. Everyone went around and said how they felt, and they had the option of saying “pass.” After each guy shared, he’d say “With that, I’m clear.” Lexie found having two-hour-long conversations with no phones refreshing because they kept everyone present and paying attention. Lexie still uses PACT’s opening ritual today. Sometimes, when meetings have a weird energy, she asks everyone to go around the room and connect by checking into the moment.

Lexie found the space sacred and loved that she did not have a role to play in those sessions unless she wanted to. They were open-ended and discussion based. Members were not there to get advice about cases and knew much more about criminal law than Yale students did. Instead, she listened to PACT members like Mario Castro, Roy Bolus, and Benjamin Smalls as they told stories. She often thought those PACT members should teach law students about public speaking. The lawyers she heard trying to give formal arguments at firms were often terrible public speakers, she says, but PACT members could speak extemporaneously with power in their voices and look people in the eye. Men always expressed gratitude that the students had driven hours to see them, even if they didn’t have any insights to offer and treated them as peers. The chance for all of them to sit in a circle on the same level felt different from the day-to-day.

In one conversation about the Innocence Project, Mr. Smalls said that he didn’t do the crime he was in for. For the first time, Lexie considered that a shockingly high percentage of people might not be guilty of the crime they were convicted of. When Mr. Smalls emphasized
that that did not mean everyone was necessarily innocent *period*, it added nuance to Lexie’s perspective. Later, in 2016, Trump announced the Muslim ban as the students were driving to Green Haven. When they got there, PACT already knew and asked everyone to share who they would vote for, if they could vote. Nearly all of them said Hillary, and Lexie recalls one member added, “We’ve had 3000 years of the patriarchy, let’s give women a chance!” But one PACT member said he would have voted Republican. The fact that they could have this conversation highlighted for Lexie that this multiracial and intergenerational group created a space where people with different perspectives could let their guard down.

Often, PACT wanted to talk about personal topics, which reminded the Yale students about the men’s lives outside the meetings and the ripple effects of their incarceration on other people. One time Mario Castro, a PACT leader, shared how he met his now wife, and how they had gotten married while he was in prison. Other members shared about their childhoods and their kids, if they had them. Another time, an Italian American PACT member shared how taking a shower in a prison is terrifying. Those stories brought home how they experienced life in prison, day in and day out for years, while Yale students dropped in for an evening at a time. Lexie heard about the way the men’s lives continued, one way or another. She never had such direct and honest conversations with people in law school. “And when I *did* share vulnerabilities outside,” she says, “I never shared with large groups of men perched on metal folding chairs.” But PACT had the courage to speak openly to a group of people they did not know well. Lexie still marvels that they created trust in an environment where members lived in constant fear of reprisal and left meetings to find segregated and fraught dynamics in the prison yard. She felt their relief to be able to sit at ease and let things off their chest, and it put her at ease, too.
Outside of sessions, PACT members gave back inside the prison. Lexie recalls that they credited Attica as the genesis of their mentoring activities. She saw them pick people they loved who were messing up and helped them get together or tutored them. They also acted as litigators. Once she glimpsed the law library and learned about a database that they used that was not connected to the internet. Every couple of weeks, a dump of new cases got uploaded. She was amazed that the men wrote briefs without Microsoft Word and Westlaw. This made her realize how amazing it is that any person in prison can file pro se briefs.

Though Lexie had limited experience with incarceration, getting to know PACT members as three-dimensional humans made her think about criminal justice differently. She started volunteering at a juvenile hall in San Francisco the year after she graduated, while clerking. Her experiences at Green Haven gave her the patience to jump through all the security hoops. When she met a student who had taught himself calculus and asked her if she had read The Rime of the Ancient Mariner, because he wanted to discuss it, she found it consistent with the unbelievable drive she had seen inside prison walls before. The following year, Lexie curated an exhibition in a New York gallery run by the Goethe-Institut about criminal justice, drawing on what she had learned from PACT. At Gibson, Dunn & Crutcher, she spends about a third of her time doing direct services pro bono work. She prefers getting to know individual people in her work rather than focusing just on a cause or set of legal issues, because PACT has made her see prisoners’ rights issues as issues affecting peers she cares about.

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By the fall of 2018, when Shiv Rawal first met PACT, former program participant and current professor James Forman, Jr., had taken over as the Yale faculty sponsor and the liaison at Green Haven had changed, which opened the doors for the law student group to expand. Shiv joined the fewer than ten students driving to Green Haven after meeting 3L directors Veena Subramanian and Devin Race who told him the twice-monthly Monday Verbal Arenas with PACT transformed their law school experience. When he started going, Shiv had a visceral reaction to how dehumanizing prison was, but through the warmth he found in the Verbal Arena, he started to think of the men as friends. In conversations with PACT members, Karim, Shah, Castro, Jay, Jason, Rob, Leroy, Dre, Ming, Deon, Jeff, Frog, Luis, Gyasi, Q, and Panna he felt moments of deep hope and love. He also felt inspired as he learned from the men that PACT programming expanded beyond their interactions with YLS to includes elements of restorative justice, conflict resolution, teaching, and self-learning.

During Shiv’s first year, PACT president Roy ‘Gyasi’ Bolus approached student co-director Devin Race about memorializing PACT in a documentary. Roy envisioned a film that would show the immense impact PACT has had on people inside and outside prisons over the past four decades. Devin found director John Lucas and worked with Roy to get approval from the New York prison system and plan logistics for a film crew to enter the prison. In early 2019, the film crew entered Green Haven to interview PACT, during which time John Lucas captured a Verbal Arena, a Tuesday Character Research session, and work in the law library. Roy Bolus gained executive clemency with the documentary underway, and the camera crew captured his first moments leaving prison.

306 The following section v. is drawn from the interview with Shiv Rawal, Student, Yale Law School (2019).
Gov. Cuomo Offers a Glimmer of Hope to Exceptional Prisoners in New York State

By Rev. Dr. Stephen Lim

Elected and serving as president of P.A.C.T. (an inmate organization called Project for a Calculated Transition), earned two master's degrees and is currently a doctoral candidate, rescued a female correctional employee from an attack, is supported by a community which quickly assembled almost 400 signatures calling for his release, supported by Correctional staff, has led 18 years of HIV counseling and prevention education, created the first “prisoner-run” accredited college program running for over 11 years, penned a book about rehabilitation to help the criminal justice system combat recidivism, facilitated self-improvement anti-recidivism programs for 25 years and the list goes on. This is what real
Later that spring, Devin and Veena organized a talk with a group of former PACT members at Yale Law School. Lexie came back the New Haven for the meeting. “PACT had hosted us so many times, it was finally our turn to make them feel welcome in our space, a place that might have felt just as foreign and alienating as a maximum-security prison was to me,” she remarked.\textsuperscript{309}

With the documentary underway, Shiv started fall of 2019 as a co-director, alongside Sophie Angelis and Rebecca Lewis. They recruited many more students, reaching the prison’s maximum number of members the prison would allow in: fourteen. After a slow fall of clearances, in December, students Sanjayan Rajasingham, Jaclyn Wilner, Gabe Lewin, Patrick Monaghan, Arnaud Nussbaumer, Zoe Masters, Alex Fay, Jacq Oesterblad, Steffi Ostrowski, and Eleanor Roberts joined Shiv, Sophie, and Rebecca on the ride to Green Haven. Unfortunately, the prison did not clear the fourteenth member, Ariadne Ellsworth. That fall, Shiv, Sophie, and Rebecca started talking about further ways to memorialize the partnership. They secured

\textsuperscript{307} E-mail from Roy ‘Gyasi’ Bolus, Lecturer, Yale University, to Eleanor Roberts, Student, Yale Law School (Nov. 26, 2021, 11:54 AM).
\textsuperscript{308} Id.
\textsuperscript{309} Interview with Lexie Perloff-Giles, supra note 298.
\textsuperscript{310} E-mail from Roy ‘Gyasi’ Bolus, supra note 300.
permission from the prison to start a newsletter. They also reached out to alumni to collect recollections about the program. In February of 2020, when Jacq and Eleanor joined Shiv, Sophie, and Rebecca as co-directors, the group discussed creating an oral history to memorialize the partnership before any more of its history could be lost.

When the prison stopped visits in March 2020 as COVID-19 ravaged New York, Shiv and the others had to pause their meetings with PACT. He and Eleanor connected with film editor Chris Etienne to keep the documentary going, and the directors undertook interviews with alumni to tell the story of how PACT’s incarcerated and formerly incarcerated members had led New York’s prison reform movement while transforming generations of Yale Law students.
VI. **PACT’s Ongoing Struggle during COVID-19**

Although the state had allowed some groups to start meeting together in the 1970s, which led to PACT’s flourishing, it has never granted most of the demands discussed in the negotiations during the Attica Uprising and rolled back the few changes it made.\(^{311}\) It has never established an independent ombudsman for the state’s prisons or raised prison wages to minimum wage (wages are currently $0.10-0.25 per hour).\(^{312}\) Today, people who file grievances with the system still often faced retaliation.\(^{313}\) Staff racism and discrimination continue to plague people who are incarcerated in New York’s prisons.\(^{314}\) The prison system did not take steps to hire more diverse guards or Spanish speakers, and most guards in upstate prisons are still white.\(^{315}\) Though incarceration rates have dropped since their peak in the 1990s, Black and Latinx New Yorkers still face overincarceration.\(^{316}\) The men in PACT have created a self-sustaining place amidst awful conditions, even as New York State has taken many steps backwards, especially with regards to health care.

New York State has continued efforts to cut medical support to the people living in Green Haven, both before and during the pandemic. In 2015, the state won a district court motion under the Prison Litigation Reform Act to terminate the Milburn consent decree that pro se litigators secured in 1982, which had governed the provision of medical care at Green Haven.\(^{317}\) The state then did away with many of the requirements. After *pro se* litigators from Green Haven appealed

\(^{311}\) Robbins, Schwirtz, Winerip, *supra* note 6, at ¶ 5.
\(^{312}\) *Id.* at ¶ 7.
\(^{313}\) *Id.* at ¶ 25.
\(^{314}\) *Id.* at ¶ 23.
\(^{317}\) E-mail from Eina Tetelbaum, Partner, Wachtell, Lipton, Rosen & Katz, to Eleanor Roberts, Student, Yale Law School (Oct. 15, 2021, 9:19 AM). *See also* Milburn v. Coughlin Case Profile, *supra* note 179.
in 2019, the Second Circuit reversed the district court decision. The state has continued fighting the medical consent decree for the past three years, and *pro se* litigants have secured appointed counsel. Now, a former Green Haven Prison Project member Elina Tetelbaum who graduated in 2010 and is a current partner at Wachtel, Lipton, Rosen & Katz, is supporting the pro bono counsel, arguing that current medical care conditions require aspects of the consent decree to be restored.318

Amid the state’s cruel efforts to stop providing medical care, the pandemic that has raged on for two years, causing significant harm to men incarcerated in Green Haven. In March 2020, as states went into lockdown, New York prisons stopped having Yale students visit, and the men of PACT were cut off from the current student group. Yale students have not returned to the prison since then, and although we have sent readings in, we have had no way to connect with and hear from the members of PACT. Even as the state conscripted men at Green Haven to make hand sanitizer, it would not provide it to them, because of its alcohol content.319 In April 2020, beloved PACT leader Mr. Benjamin Smalls, “the Elder Statesman,” passed away from COVID while his petition for executive clemency and medical release sat in Governor Cuomo’s office.320

318 E-mail from Eina Tetelbaum, *supra* note 309.
319 Interview with José Saldaña, *supra* note 3.
320 *Id.*; Eleanor Roberts’ recollection.
VII. Conclusion

The early members of PACT built a longstanding program using the revolutionary framework for self-advocacy established by the leaders of the Attica Uprising. In the decades since, PACT members have engaged in mentorship, movement studies, legal studies, therapeutic and restorative justice programming, litigation, legislative advocacy, and violence intervention. They have researched and written about incarceration, fundraised for their communities, and maintained a reading group with Yale Law students. As leaders at Green Haven, they pushed their peers in the prison to reconceptualize of themselves as a community. Throughout the decades, they have fostered creative spaces where they can use their imaginations to create life sustaining community self-empowerment.

PACT members have recognized one another’s dignity by building a political, spiritual, and legal community despite decades of prison administration backlash, which is a testament to the members’ longstanding resilience. As incarcerated men in New York have managed to sustain this program through institutional opposition, they have turned a small concession from Attica into a space for self-determination and dignity that echoes the pursuits of the men at Attica. For four days during the Attica Uprising, the men in that prison ran democratic elections, invited in negotiators to engage on their terms, and envisioned and prioritized solutions to their problems. By electing their own officers, inviting Yale Law students in to talk on PACT’s terms, and creating their own solutions inside the prison, PACT has found ways to create the kind of self-determination that leaders at Attica dared to pursue within the prison system.

Though some of PACT’s actions seek to appease the administration, their success in maintaining a longstanding community across decades of backlash has inverted the prison’s power structure and radically transformed the group’s members. By focusing on self-
empowerment, organizing their own programming, and taking the lead in their relationship with law students, PACT members have taken charge of their lives in a system that aims to fully control them. While PACT members have engaged in many legal actions, their studies transcended the traditional, simplistic legal ideas about harms and remedies. By acknowledging the harms that members have caused, as well as those society has inflicted on them, and by responding to those harms by building a self-sustaining community, PACT members have combated the individualized shame and isolation that prisons impose. Furthermore, when PACT members push law students to engage in exploratory conversations about the human condition and to recognize the legal expertise of incarcerated men, they flip the power legal professionals tend to hold in their relationships with incarcerated people on its head.

During my own time as a law student, the Verbal Arena has pushed me to recognize that creative spaces within prisons where people can engage in liberatory dialogue are essential to addressing state oppression, because community power cannot come from lawsuits alone. Participating in an equalizing space in such an oppressive environment has changed how I view PACT, my peers, myself, and my society. PACT’s endeavors pushed me to recognize how a trusting community can build revolutionary power and how important those types of connections are whenever tackling state harm. I now see community spaces that are life-giving as an essential part of the New Prison Movement. Through their structure, history, and programming, PACT continues to challenge our carceral reality and reimagine our society, proving that law students have lots to learn from jailhouse lawyers.