

**Hawaii Correctional System Oversight Commission Meeting
Summary Comments Submitted by: Carrie Ann Shirota, Esq.
Thursday, December 9, 2025 at 9:00am**

AGENDA

<https://hcsoc.hawaii.gov/wp-content/uploads/2025/12/2025.12.11-HCSOC-Agenda-FINAL.pdf>

Teleconference:Join the meeting now: [Zoom](#)

Zoom Webinar:

<https://us02web.zoom.us/j/88468810402?pwd=OThQRlvRFRYfKWxcKXap5RJWSGHxW1.1>

Meeting ID: 884 6881 0402

Passcode: 796802

AGENDA ITEMS

IV. Staff Wellness Response Team Policy

- The Oversight Commission conducted an important Staff Wellness Survey and included recommendations to improve staff wellness.
<https://hcsoc.hawaii.gov/wp-content/uploads/2025/01/HCSOC-Climate-Survey-Results-Uniform-ALL.pdf> (PTSD, Anxiety, Mental Health, Physical Health)
- It's encouraging to hear that the Department of Corrections and Rehabilitation recognizes the importance of staff well-being within the carceral system, and is taking steps to improve wellness. By its very nature, correctional settings are closed institutions of control and surveillance, and places of despair, dehumanization and violence. For too long, the Department has operated primarily from a model of punishment rather than rehabilitation. In turn, this punishment mentality negatively impacts the staff, incarcerated people and their families and our communities, where 95% of the correctional population will return home too.
- To my knowledge, there are no specific programs, counseling, grief and or/other health services for incarcerated people who witness or experience violence, and for people inside who witness suicides and murders.

Recommendation:

- The State should commission the university and/or non-profit organization to administer wellness surveys for incarcerated people in our jails and prisons in

Hawai'i, and out-of-state transfers. The State could review past inmate surveys conducted at the federal level or in other states, and tailor them to Hawai'i.¹

V. Deaths in Custody

- On April 19, 2023, HB823 HD2 was signed into law as [Act 22](#): Relating to deaths within the correctional system. Act 22 allows for the posting of a copy of the death notification report to the governor (Pursuant to [Act 234, SLH 2019](#)) on the Department of Corrections and Rehabilitation official webpage, effective 4/19/23.
- In compliance with Act 22, DCR publishes the Death in Custody Reports on its webpage. <https://dcr.hawaii.gov/notification-of-inmate-death-in-a-dcr-facility/>
- From a technical standpoint, DCR's published reports are missing requirements mandated by the **FEDERAL Death and Custody Reporting Act: Reporting Guidance and Frequently Asked Questions (revised 2025)**.
- Jails and prisons are closed institutions and paid for by tax funded dollars.
- To advance transparency and accountability, DCR should make the information submitted pursuant to the Federal and Death and Custody Reporting Act public, with the exception of confidential information

Death and Custody Reporting Act: Reporting Guidance and Frequently Asked Questions (revised 2025)

<https://bja.ojp.gov/funding/performance-measures/DCRA-Reporting-Guidance-FAQs.pdf>

General Instructions **The Death in Custody Reporting Act** (DCRA; Pub. L. No. 113-242) requires states to report to the Attorney General information regarding the death of any person who is detained; under arrest; in the process of being arrested; en route to be incarcerated; or incarcerated at a municipal or county jail, state prison, state-run boot camp prison, boot camp prison that is contracted out by the state, any state or local contract facility, or other local or state correctional facility (including any juvenile facility). These death-incustody data were originally captured by the Bureau of Justice Statistics' Mortality in Correctional Institutions data collection.

State Administering Agencies (SAAs) are responsible for collecting data on a quarterly basis from state and local entities including law enforcement agencies, local jails, correctional institutions, medical examiners, and other state agencies. SAAs are responsible for compiling and aggregating the data for submission to the Bureau of Justice Assistance (BJA). Each quarter, states must either (1) report all deaths in custody that occurred in their jurisdictions during the corresponding quarter and provide

¹<https://www.cms.gov/about-cms/agency-information/omh/resource-center/hcps-and-researchers/data-tools/sgm-clearinghouse/nis>

basic information about the circumstances of those deaths or (2) affirm that no deaths in custody occurred in their jurisdictions during the reporting period. States must answer questions related to deaths in custody in BJA's Performance Measurement Tool (PMT) and submit the information by the reporting deadline. The reporting deadline is the last day of the month following the close of the quarter (January, April, July, and October)

For each death in custody, states must enter the following information into the PMT:

- The decedent's name, date of birth, sex, race, and ethnicity.
- The date, time, and location of the death.
- The law enforcement or correctional agency that detained, arrested, or was in the process of arresting the deceased.
- A brief description of the circumstances surrounding the death. States must sufficiently answer all questions related to deaths in custody before they can submit the information in the PMT.

If a state does not have sufficient information to complete certain data elements, they may enter "Unknown" data values (when allowed in the PMT). For cases that remain under investigation, the manner of death should be reported as "Unavailable, Investigation Pending," and the state should specify when it anticipates obtaining the information.

Once the information is available, states will need to have the PMT Helpdesk unlock their reports to update them. If the information is not updated, BJA will follow up with states in subsequent reporting periods to update previous entries.

<https://bja.ojp.gov/doc/dcra-plan-hi.pdf>

DATA

- By comparison, the overall death rate from suicides among all of Hawai'i's nearly 3,800 prisoners averaged less than 2.6 per year from 2007 to 2023, according to data provided by the state Department of Corrections and Rehabilitation.
<https://www.civilbeat.org/2025/09/surge-inmate-suicides-costly-hawaii-taxpayers/>
- Hālawā prison, the state's largest with about 850 inmates, has been particularly hard hit, seeing five confirmed suicides and one suspected in the past 14 months.
<https://www.civilbeat.org/2025/09/surge-inmate-suicides-costly-hawaii-taxpayers/>

See pages 9-14 of this document that show examples of incongruence between DCR Death in Custody Reporting requirements with the federal law, and investigating reporting.

Recommendations:

- DCR's Death in Custody reports that are published on their webpage should include the following:
 - Specific age rather than a 10 year age range as listed on DCR Reports²
 - Add race data
 - Add ancestry data
 - Identify whether people are dying as a result of violence
 - Identify whether people are dying as a result of suicide
 - Cause of death should include more accurate information
 - DCR should update these reports as investigations and autopsies are completed.

VI. Kūlani Tour & Challenging DCR's Statements that Hawai'i Lacks "Space" to Return More People from Out-of-State Saguaro Prison in Saguaro

- Per DCR's Population Report for Dec., 2025, there are 91 persons at Kulani prison. Although the report lists the design and operational capacity as 200 people, the Commission noted at the 12.11.25 meeting that the capacity is 167. In summary, Kūlani's current population is at less than 50% capacity.
- Hawai'i has been transferring people to out-of-state private prisons for 30 years. This was intended as a "temporary solution" by Governor Ben Cayetano to address prison overcrowding.
- **Act 8 (2007)** requires DCR to submit Annual Reporting requirements in its Special Session Reports, Part 1, Section 7(c) Return of Out-of-State Inmates.
- Of note, Act 8 does not preclude DCR from returning people home to Hawai'i who are more than 1 year away from their max out date.
- **HCR153 passed** in 2025, REQUESTING THE DEPARTMENT OF CORRECTIONS AND REHABILITATION TO INCREMENTALLY AND SYSTEMATICALLY REDUCE THE NUMBER OF INMATES INCARCERATED IN PRIVATE, OUT-OF-STATE CORRECTIONAL FACILITIES.
https://www.capitol.hawaii.gov/session/archives/measure_indiv_Archives.aspx?billtype=HCR&billnumber=153&year=2025
- DCR's testimony on HCR 153: "DCR understands the intent of HCR 153 to return its inmates incarcerated in private out-of-state facilities, and shares the Legislature's frustration and concerns raised regarding housing inmates in facilities far from home. **DCR would have returned the inmates long ago, but for the lack of space in its correctional facilities in which to house them,**

² Of note, the Deaths in Custody reports reveal a high percentage of kupuna dying in our jails and prisons. This is a clarion call to pass Compassionate Release legislation in Hawai'i and release more people who are terminally ill, or who have chronic debilitating conditions into the community.

including the lack of appropriate rehabilitation programs for these inmates, DCR has no other choice but to send them to private out-of-state facilities.

Unfortunately, the DCR has no control over when and/or how many persons are sentenced by the court to DCR's custody and care." (emphasis added).

https://www.capitol.hawaii.gov/sessions/Session2025/Testimony/HCR153_TESTIMONY_PSM_04-11-25_.PDF

- Kūlani Correctional Facility has ample space for people out-of-state to return too.
- Attorneys (and families) are aware that some people who are doing their time without misconduct write-ups mysteriously have write-ups before returning back to home, or when close to their parole hearings, or granted parole. A misconduct has the effect of increasing a person's classification, which may result in DCR returning that individual to Halawa or Saguaro instead of transitioning to a minimum or community custody facility. It is extremely difficult for people to challenge these misconducts through the Hearing Adjustment Committees or through the grievance process. In either situation, people may face retaliation for asserting their due process rights and challenging the carceral system.

DEPARTMENT OF CORRECTIONS AND REHABILITATION WEEKLY POPULATION REPORT Date: November 17, 2025

Facility	Design Bed Capacity	Operational Bed Capacity	Total Population
Kūlani Correctional Facility (KCF) Nov. 17, 2025	200	200	86
Kūlani Correctional Facility (KCF)	200	200	91
Maui Community Correctional Center (MCCC)	209	301	216 (85 below operational capacity)
Kauai Community Correctional Center (KCF)	110	128	79 (49 below operational capacity)

Halawa Medium Security Facility (HMSF)	496	992	806 (186 below operational capacity)
O'ahu Community Correctional Center (OCCC)	628	954	941 (13 people below rated capacity)
Hawaii Community Correctional Center (HCCC)	206	226	299 (73 people above operational capacity)

DCR 2024 Annual Report for Act 8 (excerpts)

“Act 8 (2007) Special Session, Part 1, Section 7(c) Return of Out-of-State Inmates Department of Public Safety (PSD) continues to make every effort to comply with the requirement in Act 8 to return inmates housed in contracted private facilities on the mainland within one year of their parole or release date.

PSD has implemented screening mechanisms to ensure that qualified inmates are returned to Hawaii's con-ectional facilities in a timely manner. Qualified inmates are measured by the completion of all recommended programs, misconduct-free records, and minimum custody levels.

From November 2023 to November 2024, PSD brought 185 qualified inmates back to Hawaii for parole, Sex Offender Treatment program or work furlough participation.

The following table shows the inmates that are within 1 year of their parole hearing date and have not been returned in 2024:

Non-compliance in programs (i.e. Refuse programs, 93 termination of programs) resulting in Medium Custody High/Greatest category misconducts within last 18 months

109 resulting in Medium Custody Escape history within past 7 years from community

8 minimum custody facility, resulting in higher custody level Detainers (i.e. Immigration, Federal, State) that precludes 8 minimum custody housing

Refuse to work furlough programs & parole; 61

Wants to max out resulting in Medium Custody Pending parole release to another state other than Hawaii 2 (Interstate) Pending

Available bed space at furlough program 0

TOTAL 281 PSD continues to return inmates back to Hawaii from the mainland facility.

From the previous count of 876 inmates (Beginning of 2023), the count of inmates has increased to 939 inmates currently housed at the out-of-state facility. Public Safety continues to strive to comply with ACT 8 by encouraging inmates to complete their recommended programs to transition back through the work furlough program and achieve the goals and objectives of Act 8.”

<https://dcr.hawaii.gov/wp-content/uploads/2025/01/2025-Leg-Report-ACT-8-2007-SLH-Annual-Report-on-the-Return-of-Out-of-State-Inmates.pdf>

Recommendations relating to Kūlani:

- Request routine updates from DCR at Oversight Commission meetings to provide updates on compliance with Act 8 and HCR 153.
- DCR to identify persons within 2 years of their maximum date at Saguaro as potential transfers to Kūlani.
- Provide case management support and incentives for people to move through the system, and transition back into the community with enhanced opportunities for successful reintegration.

VII. Interstate Compact Act

- DCR has the legal authority to transfer people via the Interstate Compact Act to other states.³
- However, the public has limited to no publicly reported data relating to Interstate Compact Transfers. For instance, DCR’s Weekly and Monthly Population Reports does not include data relating to Interstate Compact Transfers. In effect, people subject to these transfers effectively “disappear.”
- The public should have access to data relating to the number of people transferred via the Interstate Compact Act.

³ <https://law.justia.com/codes/hawaii/title-20/chapter-355d/section-355d-1/>;
<https://dcr.hawaii.gov/wp-content/uploads/2024/06/COR.18.08-Transfer-of-Adult-Inmates.pdf>

- A number of people transferred via the Interstate Compact Act have been murdered in other states⁴ The public should have access to information assessing whether these transfers provide safe custody for people convicted by Courts in Hawai'i.
- There is a lack of public education about eligibility criteria and the process for Interstate Compact Transfers. In addition, the public has no access to data or information as to the effectiveness of these transfers.

Interstate Transfers of Inmates in the U.S. (Feb. 2006)

U.S. Department of Justice, Special Issues in Corrections

No data reported for Hawai'i

<https://www.prisonpolicy.org/scans/interstatetransfer.pdf>

DCR Annual Reports (No Data relating to Interstate Compact Transfers)

Mainland and Federal Detention Branch Center pp. 62-65

Interstate Commission for Adult Offender Supervision (2022)

<https://interstatecompact.org/about/annual-report/2022/fy2022-by-the-numbers>

2022 Incoming Acceptance Rate: 65.3%

2022 Outgoing Acceptance Rate: 82.6%

2022 Incoming Cases by State HI: 126

2022 Outgoing Cases by State HI: 241

Recommendations

- DCR to include Interstate Compact Transfer data in their Weekly and Monthly Population Reports published on their website.⁵
- Share publicly accessible information relating to the eligibility criteria for Interstate Compact Transfers and general procedures to effectuate these transfers.
- DCR to include Interstate Compact Transfer data in their Annual Reports and reports to the Legislature in alignment with Act 8 and HCR 153

⁴ <https://www.civilbeat.org/2023/02/a-hawaii-inmate-serving-a-life-sentence-has-died-in-a-florida-prison/>; https://www.kitv.com/news/crime/hawaii-man-serving-two-life-terms-dies-after-being-found-unresponsive-in-florida-prison/article_c4e9c362-a8d4-11ed-87c9-57e06a03299b.html; <https://dcr.hawaii.gov/wp-content/uploads/2015/06/NM-Media-Release-Frank-Pauline.pdf>

⁵ Admittedly, there may be valid safety considerations to not list specific states or facilities in other states. However, the Reports should include an Interstate Compact Transfer category and the corresponding number of people subject to these transfers, and gender demographic data.

EXAMPLES OF INCONGRUENCE BETWEEN DCR DEATH IN CUSTODY REPORTING AND FURTHER INVESTIGATIVE REPORTING

Principle: DCR has a duty to provide safe custody.

DEATHS IN CUSTODY

JOHN MALAKI

GENDER Male

AGE 40 to 50 age range.

Queens Medical Center

Tuesday December 02, 2025, at approximately 1039 hours.

CAUSE OF DEATH AS REPORTED BY EMS, HOSPITAL OR HOSPICE Cause of death - inmate was found unresponsive

https://dcr.hawaii.gov/wp-content/uploads/2025/12/2025-12-08_Act-234-SLH-2019-Death-Notification.pdf

Raita FUKUSAKU - MURDERED AT HALAWA

Male 50 – 60 age range

Halawa Correctional Facility, Honolulu, Hawaii

Monday, October 14, 2024 at approximately 01:40 hours.

☒ Thirty (30) day reporting (date).

WAS A CLINICAL MORTALITY REVIEW CONDUCTED? ☐ Yes ☐ No

ANY CORRECTIVE ACTION BASED ON CMR? ☐ Report Upon Receipt.

MEDICAL EXAMINER REPORT RECEIVED, DATE AND THE OFFICIAL CAUSE OF DEATH DCR received on _____, the report as determined by the Department of the Medical Examiner, STATE INFO.

10/15/25 DCR Report

<https://dcr.hawaii.gov/wp-content/uploads/2024/10/Act-234-DEATH-NOTIFICATION-FUKUSAKU-RAITA.pdf>

Civil Beat

<https://www.civilbeat.org/2024/10/inmate-who-murdered-japanese-psyhic-is-killed-in-att-ack-at-halawa-prison/>

“It was determined that the victim had been assaulted and stabbed by his cellmate, a 38-year-old male,” Honolulu police said, adding that a weapon had been recovered. A statement from corrections officials said he also suffered trauma to his head and neck.

SCOTTON, ERIC A. (Pretrial Status, Murdered at OCCC)

Inmate Male 30 - 40 age range

Oahu Community Correctional Center Honolulu, Hawaii

Wednesday, February 5, 2025 at approximately 01:55 hours.

Cause of death - **inmate assaulted by another inmate**

Currently under investigation. None

<https://dcr.hawaii.gov/wp-content/uploads/2025/02/Act-234-Death-Notification-SCOTTON-Eric-.pdf>

According to two sources, Scotton, 33, was being held with two other inmates in a cell designed for one or two inmates in a portion of the jail that is used to house mentally ill prisoners.

The sources who have knowledge of the incident also said Scotton’s alleged attacker was a sentenced felon. That is unusual because inmates who are convicted and sentenced for felonies are generally housed in prisons. Jails such as OCCC are normally used to hold people who are awaiting trial or have been convicted on less serious misdemeanor charges.

<https://www.civilbeat.org/2025/02/aclu-cites-pattern-of-violence-after-murder-at-o%CA%BBahu-jail/>

RAYMOND TERUYA (KUPUNA DYING)

Inmate

GENDER Male AGE 70 to 80 age range.

Queen's Medical Center

Wednesday, October 29, 2025, at approximately 18:48 hours.

CAUSE OF DEATH AS REPORTED BY EMS, HOSPITAL OR HOSPICE Under investigation.

https://dcr.hawaii.gov/wp-content/uploads/2025/11/2025-10-30_Act-234-SLH-2019-Death-Notificat.pdf

KEKAI KAUPU-KANEHOLANI (No Race or Ancestry Data Reporting. The deceased is Kanaka Maoli)

GENDER Male

AGE 20 to 30 age range.

STATE EITHER FACILITY OR HOSPITAL FOR LOCATION OF DEATH/INJURY THAT CAUSED DEATH Halawa Correctional Facility Honolulu, Hawaii

UNOFFICIAL OR PRONOUNCED DATE, AND TIME AS REPORTED BY EMS, HOSPITAL OR HOSPICE. Saturday, April 12, 2025, at approximately 02:28 hours.

CAUSE OF DEATH AS REPORTED BY EMS, HOSPITAL OR HOSPICE Cause of death - inmate found unresponsive and currently under investigation.

ANY INDICATION OF SEXUAL ASSAULT LEADING TO DEATH None.

https://dcr.hawaii.gov/wp-content/uploads/2025/04/2025-04-14_Act-234-Death-Notification-Gov.pdf

Anton Mykelbust (MURDERED AT SAGUARO)

The case is the second killing of a Hawaii prison inmate this year. Anton Myklebust, 46, was [found beaten and strangled](#) in a cell at Saguaro Correctional Center in Eloy, Arizona on May 4.

<https://www.civilbeat.org/beat/hawaii-inmate-in-an-arizona-prison-dies-after-apparently-being-attacked/>

The department said in its statement that staff at the prison called in a medical emergency at 5:51 p.m. on Saturday after Myklebust was discovered in his cell with injuries that “appeared to have come from an assault.”

Male 40 – 50 age range

Saguaro Community Correctional Facility, Eloy, Arizona

Saturday, May 4, 2024 at approximately 18:53:59 pm hours.

Cause of death is under investigation. None.

https://dcr.hawaii.gov/wp-content/uploads/2024/05/ACT-234-DEATH-NOTIFICATION-MYKLEBUST.ANTON_.pdf

Emelie RAUSCHENBERG (Exact Age Missing in Report)

Inmate Female

70 - 80 age range

Women Community Correctional Facility, Honolulu, Hawaii

Thursday, June 12, 2024 at approximately 2:39 pm hours.

Cause of death was not indicated. None.

https://dcr.hawaii.gov/wp-content/uploads/2024/06/Act-234-DEA-TH-NOTIFICATION-RAUSCHENBERG-E_.pdf

JIMUEL GATION (death does not appear to be listed on DCR Website)

2023

- Heard, Gary
- Kalani, Bernard
- Lafoga, Brandon
- Brooks, Jesse
- Sugiura, Leni
- Tai, Alfred
- [Kapahua, Alvin](#)
- [An Thanh, Thich](#)
- [Abihai, Allan](#)
- [Duh, John](#)
- [Vaefaga, Christopher](#)
- [Forster, Karl](#)
- [Mahuka-Mcshane, Chazaray](#)
- [Terlep, Drake](#)
- [Yoshida, Melvin](#)
- [Taylor, Richard](#)
- [Chirila, Tudor](#)

In contrast, see excerpts from *Civil Beat*'s article.

The wife of a prisoner who hanged himself last year while awaiting trial at the Oahu Community Correctional Center is suing the state, alleging staff at the jail were warned at least twice the inmate was suicidal before he died.

The wife of a prisoner who hanged himself last year while awaiting trial at the Oahu Community Correctional Center is suing the state, alleging staff at the jail were warned at least twice the inmate was suicidal before he died.

Jimuel Gatioan, 49, was found hanging in his cell at OCCC on March 28, 2023, adding to an alarming rise in jail suicides. He was taken to a local hospital where he was declared brain dead, and died six days later, according to court records.

Honolulu lawyer Jonathan Burge, who represented Gatioan, [said in an interview last year](#) jail staff were warned by both Burge and Honolulu Deputy Prosecutor Benjamin Rose that Gatioan threatened to kill himself. But Burge said the jail failed to keep Gatioan under constant supervision on suicide watch.

Rose “did what he could, and I did what I could, and it’s just ridiculous they didn’t put him on suicide watch,” Burge said at the time. “I hope things change there, because when both the state and his lawyer notify the jail, and they don’t do anything, it’s a tragedy that could have been avoided.”

A new lawsuit alleges state corrections officials failed to keep a prisoner at the Oahu Community Correction Center from killing himself even though both defense attorneys and prosecutors had warned them he was suicidal. (Cory Lum/Civil Beat/2019)

The lawsuit filed on behalf of Gatioan’s wife Judith alleges “the jail failed to provide Jimuel with necessary and appropriate mental health care, failed to keep Jimuel under constant supervision on suicide watch, and then failed to exercise reasonable and appropriate care to protect Jimuel from harming himself.”

It also alleges a “a pattern and practice” in Hawaii’s correctional facilities of “breaching the standard of care with respect to the custodial treatment of inmates and the protection of inmates from self-harm, and this pattern and practice has resulted in numerous instances of self-harm by inmates,

<https://www.civilbeat.org/2024/12/a-suicide-at-the-oahu-jail-prompts-a-lawsuit-by-the-inmates-family/>

CHRISTOPHER VAEFAGA (MURDERED AT OCCC)

Inmate Male 30-40 age range

Oahu Community Correctional Center, Honolulu, HI Saturday, Friday, July 8, 2023 at approximately 00:12 hours

Cause of death was not indicated.

ANY INDICATION OF SEXUAL ASSAULT LEADING TO DEATH None.

“PSD’S DISCLOSURE OF PROTECTED HEALTH INFORMATION INCLUDED IN THIS REPORT IS LIMITED TO THE INDIVIDUALS SPECIFIED BY HRS 353C-8.5 (ACT 234). REDISCLOSURE OF PROTECTED HEALTH INFORMATION MAY BE PROHIBITED UNDER THE HAWAII CONSTITUTION, STATE AND/OR FEDERAL LAW.”

https://dcr.hawaii.gov/wp-content/uploads/2023/07/ACT234-DEATH-NOTIFICATION_VA_EFAGA-Christopher-OCCC.pdf

Vaefaga screamed for help as his attackers beat him and stomped on his head, but jail staff did not intervene. Inmate witnesses said his face was battered and he was “bleeding all over the place.”

Vaefaga, 36, died later that day of blunt force head trauma that caused bleeding in his brain, but remained on his bunk for hours after his death. Another inmate finally used a contraband cellphone to text a woman on the outside, instructing her to call the jail and tell the staff about Vaefaga’s death.

Vaefaga’s body tested positive for methamphetamine, and a [cell-by-cell search of OCCC was launched](#) days after his death. An array of contraband was seized in the search, ranging from steroids and vapes to illicit cellphones and methamphetamine.

Deputy Attorney General Adrian Dhakhwa, who is prosecuting the case, told 1st Circuit Court Judge Paul Wong on May 15 that contraband seized in the shakedown “mysteriously disappeared,” a situation Dhakhwa said is now under investigation.

<https://www.civilbeat.org/2025/07/oahu-jail-killing-shines-a-light-on-prison-gang-mayhem/>

Thank you for the opportunity to submit comments to the Oversight Commission.

Sincerely,

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