

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

CLARE BRONFMAN,

Petitioner-Plaintiff,

v.

TIMETHEA PULLEN, in her official capacity as Warden of
FCI Danbury; FEDERAL BUREAU OF PRISONS; BRYAN
ANTONELLI, in his official capacity as Acting Regional
Director of the Federal Bureau of Prisons' Northeast Region;
COLETTE PETERS, in her official capacity as Director of the
Federal Bureau of Prisons,

Respondents-Defendants.

Case No. 23-cv-619-OAW

MOTION FOR ORDER TO SHOW CAUSE PURSUANT TO 28 U.S.C. § 2243

1. Pursuant to 28 U.S.C. § 2243 (“Section 2243”), Petitioner Clare Bronfman (“Petitioner”) respectfully requests that the Court order Respondents-Defendants to show cause why the Petition for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241, filed on May 12, 2013 herein, (ECF No. 1), should not be granted.

2. In her Petition for Writ of Habeas Corpus, Ms. Bronfman asks this Court to remedy her unlawful detention arising from Respondents-Defendants’ arbitrary and capricious failure to abide by their own regulations. In a clear abuse of discretion, Respondents-Defendants have applied the “sex offender” Public Safety Factor (“PSF”) to Ms. Bronfman’s file despite no “official documentation [that] clearly indicates” that Ms. Bronfman engaged in one of the enumerated actions for that PSF listed in the *Inmate Security Designation and Custody Classification* (“Program Statement”), the policy document that governs Respondents-Defendants’ application of PSFs. Despite Ms. Bronfman’s repeated efforts to point out the error as she exhausted her administrative remedies, the Bureau of Prisons has continued to misinterpret the record and misapply the PSF as to Ms. Bronfman.

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