

# GRATER FRIENDS

January/February 2026 Issue

## Carbon Foot Print

*Darren Gentilquore of SCI Pine Grove*

The following are some examples that should concern every resident of the United States of America.

Thousands of milk cartons, thousands of toilet paper centers, newspapers, cardboard boxes, and magazines are never recycled. These items all enter the landfills in the Commonwealth each and every day.

Water is wasted like nobody could ever imagine. The inmate toilets at SCI Pine Grove and other facilities have a pin in the drain. The pin is designed to restrict contraband. Sadly, this causes waste and toilet paper to build up. You do the math: over 800 inmates at SCI Pine Grove. Each using the toilet twice a day for solid waste. Flushing even just 5 times to clear the waste whereas I/we must flush at least seven to ten times to simply clear the toilet. The same occurs at SCI Forest, Fayette and others. Tens of Millions of gallons of water each and everyday.

The foregoing is just a glimpse of the goings on with the Department of Corrections.

## Therapeutic Community Problems

*Steven Heiser of SCI Laurel Highlands*

Lately here at SCI Laurel Highlands inmates who are required to enter/complete the Therapeutic Community program --TC-- are not being allowed to enter TC until a month or two before their minimum sentence. As the TC is a four month program, the inmates thus affected are seeing the Parole Board without a TC completion and are receiving "hits" for that reason. In essence, the DOC has decided it need not abide by judicially imposed minimum sentences handed down through regular sentencing procedures or via plea agreements.

The issues with the Therapeutic Community program is just one of many examples of the overarching problems with programming and parole.

The law in PA is that a prisoner has a right to apply for parole at the expiration of his or her minimum term and have that application fairly considered by

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## Inside This Issue

### Fighting Outside the Box

*I have sent my case to the Inter-American Commission on Human Rights.*

*I was maliciously prosecuted and have now been imprisoned for 50 years- 30 of those years being in solitary confinement. Never have I looked for trouble, but when it appears I don't duck and run from it. A soldier never knows his strength...*

*George Rashaan Brooks, Page 5*

### No Taxation without Representation

*Isn't fairness the cornerstone of justice? Isn't the right of representation, yes, the right of suffrage, one of the most basic rights in a democratic republic of the people, by the people, and for the people?*

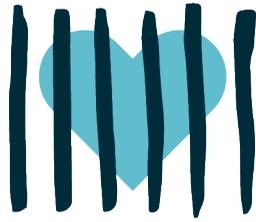
*With this being true, when someone with 34 felony convictions like...*

*Bert Hudson, Page 8*

### Prioritize mental health, now and post-release

*Prisons are very detrimental to mental health, but the impact continues on the outside after release. In Prison it's very easy to keep up with our daily medication due to us simply walking down to the pill line at a certain time of the day or when the facility medical is brought...*

*David Meade, Page 9*



# An Overview of the PENNSYLVANIA PRISON SOCIETY

## Who We Are

Founded in 1787, The Pennsylvania Prison Society is the nation's oldest human rights organization. Our mission for 235 years has been to promote the health, safety, and dignity of people impacted by mass incarceration. In 1828, the Prison Society was granted access to all people in state or county custody in PA – we remain the only non-governmental organization in the United States with our level of statutory access to people in prison. Although some of our specific programs have evolved over time, we remain committed to responding to the needs of incarcerated people and their loved ones. Today, we use that access to monitor prison conditions, assist people in prison with individual issues they raise, build connections to family and community, and educate the public about the largely hidden world of prisons.

## How do I contact the Prison Society?

You may write to us at 230 South Broad Street, Suite 605 Philadelphia, PA 19102. You can also have your loved ones call our family support helpline at anytime: 215-564-4775. Our team can assist to answer questions about specific facilities, policies, general issues, and concerns. Our team is small and we are not able to provide legal assistance, but we will do our best to help you get the information and resources you need. Unfortunately, at this time as an organization we are generally not able to use ConnectNetwork to correspond with people confined in SCIs.

## What is Prison Monitoring?

The Prison Society is the only non-governmental organization in the country with a legal right to meet privately with any person incarcerated in their state. Each month, we receive hundreds of reports concerning access to healthcare, abuse, property, conditions of confinement, treatment, and other issues. Our trained volunteer Prison Monitors can meet with anyone incarcerated in Pennsylvania state or county prison to hear their concern in detail and engage in follow-up advocacy.

Out of respect for one's privacy and safety, we will never send a Prison Monitor without an explicit request for a visit from an incarcerated person or their loved one. During a visit, a prison monitor will meet with the person in custody one-on-one to discuss and document their situation. Following the visit, volunteers are empowered to speak with prison administration on their behalf to try to improve the situation. It is important to note that we are not lawyers and cannot assist with legal issues or casework.

## What about re-entry services?

For individuals returning to the Philadelphia area, The Prison Society does have a mentoring program available designed to help ease the transition from incarceration back to communities by providing a strong social support network. We hope to expand this to other regions in the state in the future.

## What happens when I share what's going on in prison?

We are grateful to the countless people in custody and their families who help promote prison transparency across the Commonwealth. Beyond working to address concerns on an individual and/or facility level, the information you provide drives our vital conversations with Pennsylvania legislators, allied organizations, and the public. As we work to educate others and engage in systemic advocacy, it is vital that this is led by the experiences and opinions of the people closest to the problem- you! Your voices directly informed our current advocacy to end the \$5 medical copay for incarcerated people, as well as our work to remove barriers to family visits.

## What happens when I write to you?

We will always do our best to assist you. You can write to us to request resources, report conditions at a state or local facility, or request a prison monitor. The Prison Society is not a legal organization and can not provide specific legal advice or representation. However, our correspondence volunteers thoroughly respond to each and every letter we receive with information about other resources and organizations. We can also help you navigate different issues related to education, free books and other creative programs, reentry services, mental health resources, pen pal programs, and more.



## About GRATERFRIENDS

Launched in 1981 by Joan Gauker and adopted by the Prison Society in 2002, Graterfriends is a critical outlet for incarcerated people to share their opinions and experiences. We are proud to have built a powerful community with you over these past two decades and encourage you to continue submitting to Graterfriends.

We reserve the right to edit submissions. Original submissions will not be returned. Allegations of misconduct must be documented and statistics should be supported by sources. All submissions should be no more than 500 words, or two double-spaced pages. Letters more than 200 words, or one double-spaced page, will not be published in their entirety and may be shortened for clarity and space. To protect Graterfriends from copyright infringement, please attach a note, on your submission, stating that you are the original author of the work and that you give us permission to edit and print; date and sign the declaration.

# GRATERFRIENDS

## Executive Director

Claire Shubik-Richards

|                             |  |
|-----------------------------|--|
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## From the Mail Room

*Graterfriends accepts submissions regarding prison legislation, life, and creative endeavors. We do not accept submissions that are offensive in nature and target specific individuals. All letters must be signed for consideration. Names will be withheld from letters on rare occasions. While Graterfriends seeks to preserve the integrity of your work, we reserve the right to edit submissions as we see fit. Allegations of abuse or misconduct may be censored or omitted for your protection and safety.*

*continued from cover story.*

the Board.

Forcing the inmate to engage in mandatory programs uncompleted at the time of their parole eligibility results in a sham parole review, constructively no fair parole eligibility at all since the “hit” is automatically forthcoming.

You can take action. File a Petition for Review in the Commonwealth Court. Complain to the Attorney General’s Office.

Obviously what the DOC is doing is unjust and corrective action needs to be taken.

### **Life Beyond COVID**

*Wayne Thomas of SCI Albion*

**M**y intention is not to diminish the rights of victims or do away with incarceration as a consequence to crime, but to frame a debate of the lengthy sentences that have resulted from mass incarceration, and their effects on the mental health of individuals who are imprisoned. One does not surrender the human condition upon being incarcerated.

The major task those with mental health and substance abuse issues must accomplish is restoring and respecting oneself as a human being and showing kindness and compassion. Unfortunately the label and identity of a criminal offender is oftentimes engrained so deep that there is a loss of humanity that must be overcome. This may mean increasing parole eligibility to minimize the adverse effects to family separation. Maintaining ties to friends in family is important for all inmates, but especially those with mental health and substance abuse issues.

These adverse effects were only strengthened by the multi-year lockdowns of COVID-19.

The point is to raise this question: if we [as a] so-

ciety feel a negative effect on our mental health after a couple of years of staying in our homes with COVID 19. Then, what are lengthy sentences doing to the mental state of those who are imprisoned under the same post-pandemic times?

### **Be Fulfilled**

*Marcus Harris of  
Graham Correctional Center-Illinois*

**I** am a product of my society as I was manufactured and shaped by the poverty stricken neighborhoods of Chicago.

Throughout the years I have been shipped around the state of Illinois spending various amounts of time in the Illinois Dept. of Corrections warehouses. I have been sitting on a shelf for 13 years, collecting dust and getting banged up due to conditions designed for objects not people.

I am 38 years old now, with really no more real life skills than I entered with at the age of 25, but my knowledge and wisdom has immeasurably increased. I make no excuses, and I take full accountability for my actions, choices and life course. I understand what I think I am and can be nothing other than that. I must think and act in the highest imagination of myself at all times. I must erase doubt through proper preparation in all my life areas and have vision with faith that I am great. With that information I can create, manifest, have, all that I want, need, and desire.

Be Godly, Be Blessed, Be fulfilled!

## **Penitentiary Profits: A Prisoner's Stock Investing Bible by Uneak**

*Full book available on Amazon  
Robin Hickman of SCI Forest*

**W**hile doing a bid in the penitentiary, it's understandable you go through times where you dwell on all that you have lost due to your incarceration. However, you are to rise above and not fall a victim to your circumstances; it is a must that you begin to realize what can all be gained while doing time. Profit can be defined as a valuable return for something given up. When the cuffs are put on and a sentence is handed down, you have given up your physical freedom. But, it is ultimately your choice if are to profit from your time behind the walls of the penitentiary,

Penitentiary Profits: A Prisoner's Stock Investing Bible is how you begin to receive a valuable return for what you have lost. This return comes in the form of a new paradigm of freedom, money management skills, comprehensive stock market knowledge, portfolio management skills as well as investment principles that will guide you towards financial prosperity. This book, along with the resources it contains, provides you with an opportunity to shape your financial future according to your own will.

Financial security, always has and always will be a major concern for those coming home from prison. This book is how you ease them worries and step back into the world with confidence. The confidence that you now understand how to create another stream of legal income no matter what you choose to do for a living.

## **Creating A Different Trajectory for Our Existence**

*Hanif Chamber of SCI Pine Grove*

**H**ow do we evaluate our self-worth? Let's talk as if we're speaking about money. Economics provides a useful analogy. Capital is defined as resources that are withdrawn from consumption and invested in the future for higher anticipated returns. The idea of building capital has been applied to non-financial affairs. Social capital is the resources that

we accumulate from interacting with others (such as our loved ones, our comrades, our acquaintances, and organizations such as Prison Society, etc). Cultural capital is the information and resources (such as Prison Society, each other, etc) that we inherit and use to our advantage to enrich our individual lives.

So now, visualize your psychological capital to create a different trajectory for your existence. Then, evaluate your total self-worth. Now, visualize 'Freedom' in all aspects of your life.

## **Fighting Outside the Box**

*George Rashaan Brooks of SCI Coal Township*

**I** have sent my case to the Inter-American Commission on Human Rights.

I was maliciously prosecuted and have now been imprisoned for 50 years- 30 of those years being in solitary confinement. Never have I looked for trouble, but when it appears I don't duck and run from it. A soldier never knows his strength until he meets his foes. I keep my armor on and stay alert, focused in my fight for freedom, justice and equality. I have committed myself to staying on the front lines, fighting to turn back the tide of abuse of authority, human rights violations and unlawful imprisonment. I have put both my freedom and life on the line for the uplifting of a falling humanity.

In 2017, I made a request under the Right to Know Law. I appealed the denial of this request. I then filed a petition for Review in the Court of Common Pleas. I recently represented myself at a trial in October of 2024 here I argued that the Right to Know Law is a public access law and not a confidentiality statute. I am waiting for a ruling in my case. If I prevail, prisoners who were not given these items pretrial should be able to obtain them under RTKL.

It took 50 years of non-stop fighting, but I now have the evidence to support my police perjury, prosecutorial misconduct and injustice claims

## No Taxation without Representation

*Bert Hudson of SCI Greene*

Isn't fairness the cornerstone of justice? Isn't the right of representation, yes, the right of suffrage, one of the most basic rights in a democratic republic of the people, by the people, and for the people?

With this being true, when someone with 34 felony convictions like Donald Trump can be President of these United States, doesn't fairness demand that all other convicted felons should at least be allowed to vote?

When a record of 34 felony convictions may not be used to prevent a person like Donald Trump from being President, isn't it quite absurd for our Commonwealth to continue arguing the felony records of confined, constitutionally qualified, and taxpaying prisoners may be used to prevent them from even exercising their right of suffrage?

Have we already forgotten the appalling discrimination and undue sufferings of black folks and women in our country before they were finally afforded their fundamental right of suffrage in free and equal elections? Never may that happen!

In like manner, without their right of suffrage, inequitable and unfair consequences are being unduly suffered by confined felons. Just like every other group of electors, prisoners want to vote for fair and balanced representatives, judges, and other leaders over patently unfair and unbalanced get-tough-on-crime candidates.

This is all so simple.

Either we have the rule of law, or we don't. We will either obey our Constitution, or we won't. Which will it be?

*\*Editor's note: Laws vary by state, but in Pennsylvania, people with felony convictions can vote once they are released from prison.*

## A Conviction Reversed and Discharge from Custody Ordered

*Justin Corliss of SCI Coal Township*

I'm a proverbial jailhouse lawyer. A person came to me with a particularly difficult scenario. He pled guilty to having indecent contact with a girl in Baltimore. He was sentenced to time served. Upon moving to Pennsylvania, the state police contacted him, asserting that his Maryland plea required him to register as a sex offender for life. He complied initially but was subsequently charged with failing to register, pled guilty and imprisoned for 2.5- 5 years. He was paroled, violated parole, recommitted then released. Subsequently, he failed to register again, pled and received another prison sentence.

After reviewing the circumstances of his case, it was my opinion that he should not have been required to register here because the Maryland crime matched no crime here, rendering reporting unrequired. A PCRA was filed alleging an invalid plea because the state police failed to perform the required out-of-state comparison analysis. Sounds easy, it isn't.

He suffered so many ineffective attorneys it was shocking. None knew the law nor wanted to be told, by me, how to properly litigate his claims. Each appointed attorney sought to withdraw, claiming his issues had no merit. The court refused relief, requiring that we appeal. On appeal the panel reversed, finding counsels failed to act according to the law. While not ruling on the merits, in a footnote, the panel essentially provided the analysis we argued the court and attorneys ignored.

On remand, he was burdened with two more ineffective attorneys. Even with the footnote, these attorneys and the court were incapable of seeing through their errors. The court refused relief again. Ugh. Back to the Superior Court. My briefing suggested a lesser of two evils, that would provide the relief he needed. The Panel disagreed with me, to the extent that there was similarity between Maryland and a misdemeanor here; yet, ultimately granted relief, reversed the lower court, vacated the judgment of sentence, reversed the conviction and ordered him discharged from custody.

The experience was troubling because the attorneys, all of them, were guileless as they still billed the

county for claiming his case had no merit. The judge was advised, in my pleadings, and the first panel decision, what the law was and ignored it. The prosecution had a duty to know the law but remained obtusely belligerent.

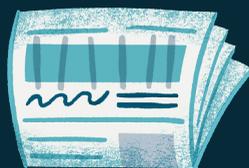
It was a lot of work, but through diligence, knowing the law and correctly pursuing the relief he was due, he's a free man, no longer required to report in this state. See *Com. v. Munoz- Rodriguez*, No. 1535 MDA 2023, decided 10/30/24.

*Hugh Williams of SCI Phoenix*

**Dear Editor,**

I would be remiss not informing you that the article "Open Letter to Governor Shapiro" in the July and August Edition was not written by me. The author should be recognized and deserves credit, not I. Therefore please inform the readership of this inadvertent error in the next edition. As said above, he deserved credit.

I thank you in advance. Do have a pleasant day.



## **CALL FOR OLD ISSUES OF GRATERFRIENDS**

For those of you new to Graterfriends over the last few years, the Graterfriends community has a history dating back to 1983 when Graterfriends was its own non-profit. We are working on a large archival project to track every submission written. Our Prison Society records only go back until 1998.

We are looking for issues prior to 1998 if any of our readers who are long time readers or authors have any copies. We can also return them to you if you only have 1 copy.

### **BACK TO THE NINTIES: 1998 & 1999**

We would like to acknowledge the following authors who were featured in the 1998 and 1999 issues of Graterfriends and continue to provide our community with engaging and helpful content:

***George Rashaan Brooks-Bey***

***Wayne Thomas***

***Kenny Davenport***

***Ronald Smith***

***Richard Grosso***

## **Maybe**

*Juicy Queen Bee*

Maybe I'm a fool  
In love with you  
Maybe I'm just trippin  
Thinking it's good between me and you  
Can keep a secret  
Had me trippin and acting a fool  
Doing things that I didn't think I could or would do  
You got me stuck  
Head spinning  
On cloud nine  
Been thinking bout you ready to catch a case for you  
I will submit to you and ride for you

## **I.L.O.V.E.Y.O.U.B.A.B.E**

*Yassin Sin Raws Mohamad of SCI Phoenix*

Intelligently I had to  
Let you know how I feel about  
Our love that I feel-  
Victorious about it because we accomplish and promise to spend  
Eternity together and forever.  
You and I really are  
One together and that's a complete cipher, a huge,  
Universe that's built around us - WE'RE ONE!  
Beauty is in all you do, not just your looks, you have  
Accomplished a lot during our tested and successful relationship.  
Because of love, dedication and sincerity we built this  
Enormous love shield around us that's unable to be penetrated.  
I LOVE YOU BABE.



### **Prioritize mental health, now and post-release**

*David Meade, Graterfriends Associate*

**P**risons are very detrimental to mental health, but the impact continues on the outside after release. In Prison it's very easy to keep up with our daily medication due to us simply walking down to the pill line at a certain time of the day or when the facility medical is brought straight to your prison cell. It's hard to miss your meds in a timely manner.

Out here in the real world, life can become so busy of us dealing with work, school, relationships, pets, and bills that sometimes we may neglect our mental health or medication. Stress, forgetfulness, and just living in a frenzy without taking care of our responsibilities and obligations.

While I was incarcerated, I was on medication, which was prescribed to me to help nerve issues related to an injury. After release, I discovered that the medication was not only for pain, but it also was an antidepressant.

After I was released from prison, I received assistance with my medication and basic needs for one year. Fast forward, after 3 years of being released, a few devastating events took place which caused me to be negligent of taking my medication. After weeks of not taking my medication, I became very emotional and slightly aggressive. I myself couldn't notice the difference in my behavior until at least 2 of my family members expressed to me that I wasn't the same person of who I once was. After clearly evaluating myself, I immediately took action and filled my prescription to attain my medication.

Everything turned out great but it did take a week for my meds to kick in and this is something that I wouldn't wish on my own worst enemies. Please, please, please always follow up with all of your doctor appointments and medication. Prioritize your health. If you so happen to be released to the Philadelphia

region, Broad Street Love has an emergency clinic that's available from Monday to Friday where you can go and receive emergency medicine which you will receive within the same day. The address: Broad St Love, 315 S.Broad St., Philadelphia, PA, 19107.

## Education and Advocacy Update

*Leigh Owens,  
Education & Advocacy Director*

**H**appy New Year on behalf of the Pennsylvania Prison Society. We are happy to announce that the Pennsylvania Budget was signed by Governor Shapiro in November and with it many of the services we've come to rely on throughout the Commonwealth were funded.

The 2025 Pennsylvania state budget is like a blueprint for how the government plans to spend money on the things you use every day, and this year, there are several big changes that directly impact your life. For those currently inside, the budget includes more money—an extra **\$143 million**—for the Department of Corrections to keep prisons running, but it is also closing some facilities (like SCI Rockview and Quehanna Boot Camp) to save money. We know that the process to move folks out of these facilities has already begun.

The budget also includes a major focus on “re-entry,” The state is setting aside **\$15.7 million** to make sure you have health insurance (Medicaid) the moment you walk out the gate, so you don't have to wait for doctor visits or medicine. There is also new funding for better drug treatment programs, including more options for **Medication-Assisted Treatment (MAT)** like methadone or buprenorphine.

The Pennsylvania Department of Corrections has a budget totalling almost \$4 billion, one of the largest expenditures in the state, yet every year there is a request for an increase in funding. Part of our work is looking at how that money is being spent and ensuring that your health, safety and dignity is part of the Department's objective in obtaining funding.

***Hearings for next year's budget are starting in February. What questions would you have for the Department? We would love to hear from you!***

In legislative news, in December the Pennsylvania House passed HB 150, which is a bipartisan plan to fix Pennsylvania's “medical release” system. It would make it much easier for incarcerated people who are

terminal, very old, or have serious disabilities to petition a judge to finish their sentence in a hospital, a nursing home, or at home with family. The bill officially passed the PA House on December 17, 2025, with a bipartisan vote of 111-92. It is now in the Senate Judiciary Committee.

While the House passage is a major step, the PA Senate is usually more cautious about release programs. However, because the bill is framed as a way to save taxpayers over \$15 million a year (by moving sick people from expensive prison infirmaries to private care), it has a better chance of gaining bipartisan support.

Right now, the law is so strict that only about 55 people have been released for medical reasons in the last 15 years. If this bill becomes law, it opens a real door for those who are physically unable to care for themselves to go home and receive dignity in their final days, while also freeing up millions of dollars that could be used for other services inside.



## FAMM Legislative Update

**F**AMM is so excited that HB 150 (medical release expansion) successfully passed out of the PA House by a vote of 111 to 92 on December 17, 2025! It is so inspiring to see such a strong bipartisan effort to move common-sense legislation forward, and we truly hope to see similar collaborative efforts as HB 150 moves through the PA Senate. Please consider contacting state Senators across the Commonwealth to urge them to support HB 150, and ask your loved ones to do the same!

HB 458 (post-conviction relief for veterans with PTSD or TBI) also successfully passed the PA House by a vote of 102-101, and is now before the Senate. FAMM supports this piece of legislation and encourages incarcerated veterans and their loved ones to strongly advocate passage of this bill!

Of interest to FAMM are also three House Resolutions that passed out of PA House Judiciary Committee that seek to humanize and better care for the people living in Pennsylvania's correctional facilities. HR 36 would commission a study on the quality of libraries in carceral facilities in Pennsylvania; HR 59 would designate November 1, 2025 as “State Correctional Institution Day” in Pennsylvania and encourage

lawmakers to visit a state prison facility unannounced at least twice per year; and HR 189 would commission a study on the nutritional value of food served in Pennsylvania's State Correctional Institutions, as well as the nutrition-related health of people living in these facilities.

As we patiently await the Pennsylvania Supreme Court's ruling regarding felony murder sentencing in *Commonwealth v. Lee*, FAMM is happy to support SB 387 and HB 443, which would allow parole eligibility after 25 years served for people convicted of felony murder.

FAMM is also excited to support HB 1506, which would make communications free for people incarcerated in Pennsylvania. FAMM also continues to monitor and oppose legislation containing mandatory sentences in Pennsylvania.

## FAMM Advocacy Workshops

Are you interested in FAMM facilitating Storytelling and Legislative Advocacy workshops in your facility? Let us know by writing to FAMM attn: Advocacy, 1100 13th Street, Suite 201, Washington, D.C. 20005, or emailing [advocacy@famm.org](mailto:advocacy@famm.org).

## FAMMGRAM

FAMM is now mailing out quarterly FAMMgrams about our work in reform across the country. These free newsletters share valuable information for you and your friends and families on the outside. If you'd like to start receiving the FAMMgram through the mail, please send your name, DOC number, facility name, and complete mailing address to: FAMM, 1100 13th Street, Suite 201, Washington, D.C. 20005.

## Updates to Board of Pardons Clemency Application

*Noelle Gambale*

The Board of Pardons recently released an updated clemency application. The old applications ARE NO LONGER ACCEPTED. If you have already mailed yours in during 2025, then you are still okay.

### Request an Application By Mail:

You may request a new application from the Board of Pardons by mail. You must send the Board of Pardons the following information:

- Applicant name
- Mailing address to send the application
- Phone number (optional)
- Email address (optional)

The Board of Pardons address is:  
PADOC/BSAAC/Division of Field Audits & Clemency Investigations  
1920 Technology Parkway  
Mechanicsburg, PA 17050

### New Updates

- Easier to follow graphics
- Personal Statement is no longer an optional section - it is now required
- More emphasis on court debt needing to be paid off- this has become a larger factor in the Board's decisions
- More helpful guides in the case information section

## Three Strikes and . . . ?

*Pennsylvania Institutional Law Project*

Many incarcerated individuals who have brought lawsuits are familiar with the "three-strikes rule" of the Prison Litigation Reform Act (PLRA). Under this rule, an incarcerated person who had three or more prior federal lawsuits dismissed by a court is prohibited from bringing another federal lawsuit in forma pauperis (i.e., without having to pay the full filing fee upfront). See 28 U.S.C. § 1915(g). They would only be able to file a new lawsuit if they pay the full filing fee upfront, or if they are in imminent danger of serious

physical injury.

What you may not realize is that Pennsylvania has its own Prison Litigation Reform Act, which is modeled on the federal law and has its own “three-strikes rule.” See 42 Pa. C.S. § 6602(f). Under the Pennsylvania three-strikes rule, like the federal rule, incarcerated individuals are penalized if they have three “strikes,” i.e., three prior lawsuits that have been dismissed.

But what is the penalty? Can they simply be barred from proceeding in forma pauperis, like under the federal law? Or can their cases be kicked out of court, even when they are willing to pay the full filing fee upfront?

The Commonwealth Court of Pennsylvania recently invited the Pennsylvania Institutional Law Project (PILP) to submit an amicus brief (also known as a “friend of the court” brief) addressing this question. PILP’s work is primarily focused in the federal courts, but due to the importance of this issue, PILP filed an amicus brief in this case.

There are several prior Commonwealth Court decisions that interpret Pennsylvania’s three-strikes rule as only preventing people with three strikes from proceeding in forma pauperis, just like the federal rule.

However, there are at least two Pennsylvania judges who interpreted Pennsylvania’s three-strikes rule as allowing courts to dismiss the cases of people with three strikes even when they have paid, or are willing to pay, the full filing fee. Montgomery County and the County Commissioners Association of Pennsylvania (CCAP) have each filed briefs arguing that this interpretation is correct. Montgomery County and CCAP’s position would allow judges to dismiss an incarcerated person’s state-court lawsuit solely because the person who filed it had three prior lawsuits that were dismissed. Courts would be able to dismiss cases without even evaluating them on the merits—indeed, without even reading them. And courts would be able to do this even if the person had paid, or was willing to pay, the full filing fee.

PILP filed a brief on November 21, 2025 that argued forcefully against this interpretation. PILP argued that the best reading of the plain text of the statute, especially when read in context, is that it only applies to in forma pauperis actions. (After all, it is in the section titled “Prisoner filing fees.”). PILP also argued that if the three-strikes rule was interpreted as Montgomery County and CCAP argue, it would be unconstitutional in several ways.

People living in this country—including in its prisons and jails—have a fundamental right to access the

courts and to complain to the government when it has wronged them. While courts have said that stopping people from proceeding in forma pauperis based on the dismissals of their past lawsuits is permitted under the Constitution, allowing courts to dismiss cases solely based on having cases dismissed in the past, even when people are willing to pay the filing fee, is much more extreme. In its brief, PILP argued that this would violate the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the U.S. Constitution, the Petition Clause of the First Amendment to the U.S. Constitution, and the Open Courts and Remedies Clause (Article I, Section 11) of the Pennsylvania Constitution.

PILP looks forward to seeing how the Commonwealth Court will rule in this important case. The case is *Lawson v. Court of Common Pleas of Montgomery County Prothonotary Office*, No. 277 MD 2022 (Pa. Commw. Ct.). If you would like a copy of PILP’s brief, please write to:

PILP, 718 Arch Street, Suite 304 South, Philadelphia, PA 19106.

The Pennsylvania Institutional Law Project (PILP) is a statewide legal aid organization that protects and advances the constitutional and civil rights of people incarcerated in Pennsylvania through litigation, advocacy, and legal advice.



# Buses Are Back.

The Prison Society is providing low-cost rides for your loved ones from Philadelphia to four state correctional institutions: **SCI Benner, SCI Frackville, SCI Mahanoy, and SCI Muncy.**

Tell your loved ones to purchase tickets one of two ways:

- **Online:** Visit [www.prisonsociety.org/services/transportation](http://www.prisonsociety.org/services/transportation)
- **In-person:** 230 S. Broad Street, Suite 605, Philadelphia, PA 19102 (Monday - Friday, 9 AM - 5 PM)
- **Call** our office at 215-564-4775.

## Upcoming Trips

### April 2026

| Date             | Destination |
|------------------|-------------|
| Monday, April 6  | SCI Benner  |
| Friday, April 24 | SCI Muncy   |

### July 2026

| Date            | Destination    |
|-----------------|----------------|
| Monday, July 6  | SCI Benner     |
| Sunday, July 26 | SCI Muncy      |
| Monday, July 27 | SCI Frackville |
|                 | SCI Mahanoy    |

# REQUESTS FOR RESOURCES

In lieu of a list, please request resources directly with this form. Please allow one month for a response.

Pennsylvania Prison Society  
ATTN: Resources

230 South Broad Street, Suite 605  
Philadelphia, PA, 19102

Complete and mail to the Pennsylvania Prison Society:

**Name, ID Number, Facility**  
**If Applicable: Returning County for Re-entry Resources**

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**Resource Description**  
**Note: The Prison Society does not offer financial assistance**

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# **READER SURVEY**

We welcome comments and suggestions from all readers.  
Please complete this form and mail it to the Pennsylvania  
Prison Society.

Pennsylvania Prison Society  
ATTN: Resources  
230 South Broad Street, Suite 605  
Philadelphia, PA, 19102

## **Name, ID Number, Facility**

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## **Comments and Suggestions**

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