



January 5, 2024

Oklahoma Pardon and Parole Board
2501 N. Lincoln Blvd.
Suite 201
Oklahoma City, OK 73105

Subject: Comments Regarding Proposed Rule Changes

Dear Members of the Oklahoma Pardon and Parole Board,

I am writing as a citizen of the State of Oklahoma and on behalf of Right On Crime. We have spent over a decade in Oklahoma supporting conservative solutions for reducing crime, restoring victims, reforming offenders, and lowering taxpayer costs.

Right On Crime would like to express our reservations concerning the proposed rule changes by the Oklahoma Pardon and Parole Board that will narrow eligibility for commutation relief and limit the Governor's commutation power. While I appreciate the importance of government efficiency, these proposed changes lack a clear rationale and raise several points warranting reconsidering.

The Governor's authority to commute sentences, as outlined in the Oklahoma Constitution, is intentionally broad. The proposed rules impose unwarranted restrictions on the Governor's power, which could undermine the effectiveness of this long-standing authority. It is crucial to emphasize that the Pardon and Parole Board's role is to conduct an impartial investigation and recommend only those applications deemed worthy of commutation to the Governor. Severely limiting the pool of applicants may hinder the Governor's ability to exercise this authority judiciously.

Additionally, the absence of a formal process for individuals to make commutation requests directly to the Governor may introduce unnecessary confusion and waiting times for those who have traditionally applied directly to the Pardon and Parole Board. Additionally, introducing a trial official to recommend individuals for commutation raises concerns, given the broad and undefined nature of the term. This may include Judges or the current elected district attorney, who may understandably be cautious about reconsidering sentences they previously supported, contributing to potential congestion within the court system.

In the current process, judges, district attorneys, and victims can express their support or opposition, facilitating a comprehensive consideration of each case by the Pardon and Parole Board. Expanding the power of judges and district attorneys to determine who can apply for commutation may safeguard against potential sentencing disparities while still ensuring a fair and just process. Moreover, limiting

eligibility for commutation may inadvertently drive individuals to seek relief through the court systems, contributing to increased court dockets and processing delays.

Commutation can create better opportunities for those with a criminal record who show the public they have changed. Past commutation recipients have demonstrated the positive impact of rejoining the workforce, caring for their families, and contributing to their communities. In times of economic uncertainty and labor shortages, it is prudent to carefully weigh any changes that might hinder individuals' opportunities for rehabilitation.

I urge you to reconsider these proposed rule changes, considering the conservative principles of justice, fairness, and the long-term well-being of our communities. Your thoughtful consideration of these concerns is greatly appreciated.

Thank you for your time and dedication to serving the citizens of Oklahoma.

Sincerely,

Marilyn Davidson
Regional Director and Oklahoma State Director
Right On Crime

CC: Kyle Counts, General Counsel, Oklahoma Pardon and Parole Board
Governor J. Kevin Stitt