

EXHIBIT 36

TROUTMAN SANDERS LLP

ATTORNEYS AT LAW
A LIMITED LIABILITY PARTNERSHIP

THE CHRYSLER BUILDING
405 LEXINGTON AVENUE
NEW YORK, NEW YORK 10174
www.troutmansanders.com
TELEPHONE: 212-704-8000
FACSIMILE: 212-704-8288

Seanna R. Brown
seanna.brown@troutmansanders.com

Direct Dial: 212-704-8448
Direct Fax: 212-704-8382

November 19, 2007

BY FIRST CLASS MAIL

Freedom of Information Act Officer
United States Attorney's Office
United States Courthouse & Federal Building
5500 Veteran's Drive, Suite 260
St. Thomas, Virgin Islands, 00802-6424

Re: Golden Grove Adult Correctional Facility, St. Croix, U.S. Virgin Islands
Anna's Hope Detention Center, St. Croix, U.S. Virgin Islands
This Regards a Death Penalty Case; Expedited Processing Requested.

Dear Freedom of Information Act Officer:

Pursuant to the Freedom of Information Act, 5 U.S.C. §552, I respectfully request certified copies of all records, documents, and/or files in the possession or under the control of your office or agency and/or any person, division, department or similar subsection of your office or agency, regarding the above referenced facilities, including, but not limited to material relating to:

any investigations, inspections, civil actions, criminal actions, institutional lawsuits, civil rights complaints, stipulated agreements, consent decrees, special master appointments, federal reports, and/or subpoenas regarding either of the above referenced facilities.

In making this request, I would like to direct your attention to a recent press release by the Department of Justice ("DOJ") regarding legal action the DOJ has taken against Golden Grove, attached hereto as Exhibit A. As you will see, the press release references a longstanding Consent Decree that the U.S. Government has with the Virgin Islands regarding conditions at Golden Grove and the services that the U.S. has provided to the Virgin Islands to remedy those conditions. The press release refers to recent court filings in the United States District Court for the Virgin Islands. The press release also specifically references statements made by Bradley Schlozman, Acting Assistant Attorney General for the Civil Rights Division.

TROUTMAN SANDERS LLP
ATTORNEYS AT LAW
A LIMITED LIABILITY PARTNERSHIP

Freedom of Information Act Officer

August 16, 2007

Page 2

For the purposes of the request, the terms "records," "documents," and "files" are intended to include, without limitation, any and all written, typed printed, recorded, graphic, computer-generated, or other matter of any kind from which information can be derived, whether produced, reproduced, or stored on paper, cards, tapes, films, electronic facsimiles, computer storage devices, or any other medium. They include, without limitation, letters, memoranda (including internal memoranda), calendars, schedules, books, indices, notes, printed forms, publications, press releases, notices, minutes, summaries or abstracts, reports, files, transcripts, computer tapes, printouts, drawings, photographs, recordings (including both videotapes and audiotapes), telegrams, and telex messages, as well as any reproductions thereof that differ in any way from any other reproduction, such as copies containing marginal notations.

Please certify all provided records. I understand that there may be a charge for certified records. Please provide an itemized statement of all incurred charges. Please note that this request is specifically for certified records and that no charges are authorized for the production of uncertified records.

If your search produces no records please send a signed, dated letter on letterhead to that effect. Please include in that letter any other departments or offices known to you that could have documents responsive to this request.

Further, to the extent that your office determines that any materials related to these requests are not responsive to this request or will not be disclosed, I request that your office make an item-by-item catalog of those materials not disclosed and the reasons for the non-disclosure.

These records are being requested as they relate to pending legal proceedings. The time constraints of these legal proceedings are pressing and require that I request all possible expediency on the part of your office and agency.

Thank you very much for all of your assistance in this matter. If any questions should arise during the search for these records, please do not hesitate to contact me at the number listed above.

Very truly yours,



Seanna R. Brown

EXHIBIT "A"



Department of Justice

FOR IMMEDIATE RELEASE
TUESDAY, NOVEMBER 8, 2005
WWW.USDOJ.GOV

CRT
(202) 514-2007
TDD (202) 514-1888

JUSTICE DEPARTMENT FILES FOR CONTEMPT AGAINST GOLDEN GROVE PRISON AUTHORITIES REGARDING CONDITIONS OF CONFINEMENT

WASHINGTON, D.C. - The Justice Department today announced that it filed a Show Cause Motion with the United States District Court for the Virgin Islands asking the Court to hold the Virgin Islands in contempt of a long standing Consent Decree regarding conditions of confinement at the Golden Grove Prison and Detention Facility in St. Croix.

A Consent Decree was filed in November 1986 that required Golden Grove to remedy unconstitutional conditions including operational and security procedures, medical and mental health care, and fire safety and environmental sanitation deficiencies. In the years following, the United States provided technical assistance to the Virgin Islands in the form of expert consultant reports, staffing needs assessments and other assistance. The United States also obtained supplemental Orders and agreements with the Virgin Islands on several occasions to implement the Consent Decree's requirements. In 2003, 2004 and 2005 the Justice Department conducted expert consultant visits at the facility and received reports, which were shared with the jurisdiction in an attempt to identify current and ongoing conditions that did not meet constitutionally mandated minimum requirements of security and safety. The jurisdiction promised remedial action, but Justice Department attorneys found that conditions at the facility had regressed in all areas. The Department found a routine history of inmate on inmate assaults, lack of correctional officer staffing in housing units, and constitutionally inadequate medical and mental health care for incarcerated individuals.

"The Justice Department has made every effort to assist the Virgin Islands in meeting its obligation to remedy the deplorable current and ongoing violations at Golden Grove," said Bradley J. Schlozman, Acting Assistant Attorney General for the Civil Rights Division. "Today, we are simply asking the court to ensure this prison facility's compliance with constitutional standards."

In its filing, the Department asks the Court to find the Virgin Islands in contempt of the Consent Decree, supplemental Court Orders, and Plan of Compliance and further seeks the appointment of a Special Master to implement the requirements of the Consent Decree.

###

05-601