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06/14/2025

Michigan State Police
Sex Offender Registry Division
333 S. Grand Avenue
Lansing, MI 48909

RE: Formal Request for Immediate Removal from the Michigan Sex Offender Registry
Based on Expiration of Initial Registration Period and Binding Federal & State Court Judgments

To Whom It May Concern:

I am writing to formally request immediate and permanent removal from the Michigan Sex Offender Registry, pursuant to the expiration of my original registration period and in light of binding court rulings—both federal and state—that prohibit continued enforcement of the Michigan Sex Offenders Registration Act (SORA) as applied to individuals in my legal class.

My registrable offense occurred on April 20, 2000. Under the statutory framework in effect at that time, I was assigned a 25-year registration period, set to expire in April 2025. Subsequent amendments to SORA—particularly the tier-based classification system enacted in 2011 and reasserted in 2021—retroactively reclassified individuals like me and unlawfully extended their registration periods and reporting requirements. These amendments have since been declared unconstitutional.

The following rulings support my request, presented in chronological order:

- Does v. Snyder, No. 2:12-cv-11194 (E.D. Mich. filed March 2012): This federal lawsuit laid the foundation for striking down retroactive application of SORA.
- Does v. Snyder, 834 F.3d 696 (6th Cir. 2016): The U.S. Court of Appeals held that Michigan's 2006 and 2011 SORA amendments, when applied retroactively, violate the Ex Post Facto Clause of the U.S. Constitution. The Court found these amendments punitive in effect—including geographic exclusion zones and enhanced reporting—and therefore unconstitutional as applied to individuals like me, whose offense predates them.
- People v. Betts, 507 Mich. 527 (2021): The Michigan Supreme Court held that retroactive application of the 2011 SORA amendments violated both the Michigan and U.S. Constitutions'

Ex Post Facto Clauses. Mr. Betts, like me, was convicted before the 2011 amendments, and the Court ruled that the law could not impose retroactive burdens.

- Does II v. Whitmer, No. 2:12-cv-11194 (E.D. Mich.): This follow-up to Does v. Snyder prohibited criminal prosecution for failure to comply with the pre-2011 SORA, reinforcing that post-2011 requirements cannot be applied retroactively to pre-2011 convictions.

- Does III v. Whitmer, No. 2:22-cv-10209, 751 F. Supp. 3d 761 (E.D. Mich. 2024): The Court struck down SORA 2021 in its entirety as applied to individuals whose offenses occurred prior to July 1, 2011. The ruling affirmed that the 2021 statute imposed unconstitutional retroactive punishment, and that its provisions could not be severed or saved.

- Doe A v. Whitmer, No. 2:22-cv-10209, Doc. 192 (E.D. Mich. May 19, 2025): Denied the State's motion to stay enforcement of the Does III judgment. The Court emphasized (1) that the State is unlikely to succeed on appeal, (2) that enforcement of SORA against individuals in my class causes ongoing constitutional harm, and (3) that immediate relief serves the public interest.

Conclusion:

Because (1) my original 25-year registration period has expired, and (2) both federal and state courts have consistently ruled that retroactive application of SORA is unconstitutional for individuals whose offenses predate July 1, 2011, there remains no lawful basis for continued registration.

Accordingly, I respectfully request the following:

1. Immediate and complete removal from the Michigan Sex Offender Registry;
2. Written confirmation that I am no longer subject to any SORA registration obligations;
3. Cessation of all related enforcement, monitoring, and reporting expectations.

Please contact me if additional documentation is required. I appreciate your attention to this matter and your compliance with binding judicial precedent.

Respectfully,

[REDACTED]