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April 17, 2018

Board of Parole Hearings  
Attn: Nonviolent Parole Review Process  
P.O. Box 4036  
Sacramento, CA 95812-4036

**Re: Inmate Michael Angelo Morales; CDCR BE1755  
Ventura County Superior Court Case 2015007248  
Opposition Letter Due to Board of Parole Hearings April 18, 2018**

Dear Board Members:

This letter is written to recommend denial of early parole for inmate Michael Morales. In May 2015, the inmate was initially sentenced to local jail and probation, but after multiple violations of probation, he was sentenced to 6 years 4 months in prison on August 25, 2017. Releasing the inmate now would mean he would only serve approximately 25 percent of his actual sentence. This recommendation to deny early release is based upon:

- 1) The inmate's commitment offense;
- 2) The inmate's criminal history and continuing criminal conduct; and
- 3) The unreasonable risk of violence to the community if the inmate is released early.

## **CIRCUMSTANCES OF COMMITMENT OFFENSE**

On March 5, 2015, the inmate and fellow documented Tocas gang member, Bryan Pahua (CDCR BB9002), approached the victim in the common laundry room of the Warwick Apartments. This apartment complex is the stronghold of the Tocas criminal street gang, and an area subject to constant terrorizing by the gang members.

While confronting the victim, the inmate and Pahua demanded the victim give them his money. When the victim said he didn't have any money, they demanded to know where he lived, and continued demanding his money. Fearing for his safety, the victim tried to get past the inmate and Pahua. The inmate and Pahua then attacked the victim with fists

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and hit him several times causing injury to his face. During the violent assault, the victim's hat was knocked off his head. The victim was able to get past the inmate, and he ran for help. As he fled, the victim saw Pahua retrieve the fallen hat, and the two gang members leave the scene.

The inmate pled guilty to attempted robbery and committing the crime for the benefit of a criminal street gang. Due to his young age and his criminal history as a juvenile, the court initially gave the inmate a grant of probation and local jail. The inmate was only on probation for a few months before he committed his first violation. The inmate was caught driving under the influence of alcohol and he had two billy clubs in his car. The inmate pled guilty to those charges on June 19, 2017. Within two days of his admission, he was again caught in possession of a billy club. Based on this, and other violations of probation, the court eventually sentenced the inmate to prison for 6 years 4 months.

### **CRIMINAL HISTORY AND SUBSEQUENT CRIMINAL CONDUCT**

This was not the inmate's first criminal act. He began his gang life committing crimes as a juvenile, and he hasn't changed now that he is an adult.

On February 3, 2013, witnesses were barbequing in their backyard when the 15-year-old inmate and his associate peered over the gate and yelled, "Come out here you fucking pussy!" The inmate held a collapsible "police-style" billy club up in the air as he challenged the witnesses.

On March 14, 2013, the inmate was contacted and found to be in possession of a large plastic bag containing 20 bags of methamphetamine (totaling 4.5 grams), a bag of marijuana, and an electronic scale.

On March 21, 2013, the inmate, along with several gang members and/or associates, assaulted a female juvenile due to her dating a rival gang member.

On October 17, 2013, the inmate hit a 17-year-old victim in the jaw.

In November 2013, victims, Ulysses K. and Dominick K., were walking home when they were attacked from behind by the inmate and his associate. As Ulysses was helping Dominick up to his feet, the inmate charged them while swinging a billy club. The victims escaped and called the police.

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## **DISCUSSION**

Granting early parole of the inmate poses a safety risk to the community. The inmate's violent history, his refusal to change his behavior, and his current offense demonstrate he is a hardened gang criminal. The nature of this offense, to target an innocent law-abiding citizen whose only offense was to be present on Tocas gang turf, and then execute a brutal attack to rob him, shows his predatory nature. Whether he is acting in concert with violent gang members, repeatedly possessing prohibited weapons, or attacking innocent people, the inmate is unpredictably violent. In all likelihood, he will victimize others when released. He should serve his full prison term.

## **CONCLUSION**

The inmate poses an unreasonable risk of violence to the community if granted early parole. I respectfully request the Board deny early parole for the inmate.

Very truly yours,



GREGORY D. TOTTEN  
District Attorney

GDT:dr

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