

## **PETITION FOR COMMUTATION OF SENTENCE**

### **Relief sought:**

Reduction of prison sentence  Reduction of prison sentence and remission of fine/restitution

Reduction of supervised release, probation, or parole

## To the President of the United States:

**The undersigned petitioner, a person subject to federal imprisonment or other restriction, asks for commutation of sentence and in support thereof states as follows:**

## 1. Identifying information:

Name: Yener Vahit Belli  
(first) (middle) (last)

Name at Conviction: \_\_\_\_\_

Date of Birth: 02/21/1984

Place of Birth: Tampa, FL, USA  
(city) (state) (country)

BOP Register No. : 53741-018

Sex:  Female  Male

Are you Hispanic or Latino?  Yes  No

Race:  
(select all that apply)

Alaska Native or  
American Indian

Asian

Black or African American

### Are you a U.S. Citizen?

Yes

○ No,

(country of citizenship)

Is an attorney helping you with this petition form?

Yes  No

Attorney name: Michael Beltran

Attorney email: [mike@beltranlitigation.com](mailto:mike@beltranlitigation.com)

**2. Contact information, if on home confinement or supervised release:**

Address: \_\_\_\_\_  
 (number) (street) (apartment unit no.)

\_\_\_\_\_ (city) (state) (zip code)

Cell phone: \_\_\_\_\_ Home phone: \_\_\_\_\_ Email: \_\_\_\_\_

**3. Case information:**

How did you plead?  Guilty  Not guilty  Nolo contendere

Offense Date: 10/13/2010 Conviction Date: 10/05/2012 Sentence Date: 01/11/2013

Case No.: 8:11-cr-307-T-33TBM Court:

U.S. District Court for the Middle District of FL  
 (Eastern/Northern, etc.) (state)

Superior Court of the District of Columbia

Offense or crime: two counts of using or carrying a firearm during and in relation to a crime of violence  
 (specific offense(s); provide statute(s) violated, if known)

Sentence: Imprisonment:  Term: <u>32,0</u> (years, months)	Probation or supervised release:  Term: <u>5,0</u> (years, months)	Financial penalties:  Fine: <u>0.00</u> Restitution: <u>1,120.00</u> Assessment: _____ Date paid: _____ Amount unpaid: _____
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When did you begin serving your sentence? 10/21/10

What is your projected release date? 07/24/2038

Are you eligible for parole? No Provide parole eligibility date: \_\_\_\_\_

Date of last hearing: 1/11/13 Date of next scheduled hearing, if any: \_\_\_\_\_

Have you applied for federal clemency before?  Yes  No

Date applied: \_\_\_\_\_

Date of decision: \_\_\_\_\_

Granted

Denied

No Action

#### 4. Offense details

Please tell us about the offense for which you are seeking commutation. Be specific and complete. Do not omit facts or minimize your role. We want to hear from you, in your own words. Please include:

- What was your role in the offense?
- How, when, and why did you get involved?
- What actions did you take in connection with the offense? (Include all actions, even if you pleaded guilty to only specific conduct, counts, or portions of the full criminal activity.)
- Do you accept responsibility for your criminal conduct?

In 2011, I participated in convenience store robberies in the Tampa area. I take full responsibility for my actions. I was the person who entered the stores, presented a firearm, and took money from the registers. The total amount stolen was approximately \$1,120. The gun I used was not loaded (there was no magazine or bullets in it) but I recognize that the presence of a firearm during a robbery creates fear, even if no one was physically harmed. I never discharged the firearm, I never physically touched or restrained anyone, and no one was injured. At the time of the offenses, I was 26 years old and struggling with drug addiction and untreated bipolar disorder. I had never been in serious trouble with the law before and had no history of violence. My addiction, poor judgment, and mental health issues led me to make reckless decisions that I deeply regret. I was arrested, cooperated with authorities, and pled guilty to two counts under 18 U.S.C. § 924(c), relating to the use or carrying of a firearm during and in relation to a crime of violence. The mandatory sentence at the time was 384 months (32 years), based on what was then called "stacking" of § 924(c) charges. I have taken full responsibility for my conduct from the beginning. I pled guilty, accepted the court's sentence, and have spent over 14 years working every day to change my life. I have pursued education, job training, and mentorship roles while incarcerated. I know I can never undo what I did, but I have done everything within my power to become a better man, and I am asking for a second chance.

See correspondence for further information.

## 5. Other criminal record:

Please list all other arrests and criminal convictions. You may reference your presentence report (PSR) or other official documents, but if there is additional information to report, please provide it below.

There are no other criminal convictions. For other arrests please review the attached Presentence report.

## 6. Reasons for seeking clemency

In your own words, tell us why you are seeking commutation of your sentence. If you need more space, you may complete your answer on a separate sheet of paper and attach it to this petition.

I am seeking clemency because the sentence I received was for 384 months (32 years) and it no longer reflects the law or the goals of justice. In 2012, I was sentenced under a now-repealed interpretation of 18 U.S.C. § 924(c) that required "stacked" mandatory minimums for multiple firearm offenses in a single case. If I were sentenced today, the mandatory sentence would be 14 years, not 32. I have already served more than 14 years and earned substantial good time credit. Under current law, I would have been released already. I have worked hard during my incarceration to grow, reform, and prepare for a productive life outside of prison. I earned a Master's Degree in Business Administration, became a certified paralegal, and have mentored younger inmates. The Bureau of Prisons reclassified me to a low-security facility and correctional staff have described me as a role model. I also have a reentry plan in place that includes stable housing, full-time work with my family's business, and spiritual and emotional support from my church community. I never physically harmed anyone. The firearm I carried during the robberies was unloaded. While I fully accept responsibility for my actions and the fear they caused, I am not the same person I was at 26. I am asking for clemency because I have served the time Congress now considers fair for my conduct, and because I am ready to return to society as a contributing, law-abiding citizen. I respectfully ask for mercy so I can finally come home.

See correspondence for further information.

## 7. Rehabilitation

Tell us about programs, classes, substance abuse treatment, institutional employment, or other activities that you have completed while in prison that have been meaningful for you.

Note: We will review Bureau of Prisons records as part of your application. You do not need to list every program or activity. However, please DO include information that might not be in those records, such as:

- Mentoring activities
- Leading group meetings or studies
- Staff recommendations from supervisors, chaplains, or program directors

During my more than 14 years in prison, I have committed myself to personal growth, education, and helping others. I earned a Master's Degree in Business Administration and became a certified paralegal while incarcerated. I also completed vocational training in HVAC and construction-related fields, which I plan to use to support myself after release. One of the most meaningful parts of my time in prison has been mentoring younger inmates. I've helped others develop discipline, pursue education, and avoid the mistakes I made. I take pride in being a steady, positive influence in a difficult environment. I've maintained consistent institutional employment and received positive evaluations from staff. My BOP Correctional Counselor, Mark Jones, wrote a letter describing me as a "role model for younger inmates" and stated that I have "made a turnaround on [my] life goals and focuses." I've been reclassified to FCI Miami, a low-security facility, which reflects my good conduct, low recidivism risk, and strong programming record. These experiences have shaped me into a more thoughtful, responsible person. I've used every opportunity to improve myself and prepare for a productive life after prison.

See correspondence for further information.

## 8. Release plans

Tell us about any plans you may have made for your release, such as where you will live or seek employment. You may also include letters of support from friends, family, and others.

If granted clemency, I plan to live with my family in either Valrico or Lakeland, Florida. I have strong support from my immediate and extended family, including my mother, brother, and church community. I will work full-time with my brother's electrical contracting company, which also operates in general contracting and roofing. While incarcerated, I've completed HVAC-related training and plan to obtain my HVAC license to contribute immediately to the business. In addition to full-time employment, I will participate in church programs several times a week and continue receiving mentorship from my longtime pastor, who has welcomed me back to the church community. I also have extended family committed to helping me transition and remain accountable. My reentry plan is realistic, structured, and supported. I've worked hard to prepare for this next chapter and am fully committed to being a productive, law-abiding member of society. I'm ready to prove that I've changed and to give back to the community that stood by me.

See correspondence for further information.