

STATE OF MICHIGAN
IN THE SUPREME COURT

PEOPLE OF THE STATE OF MICHIGAN

Plaintiff-Appellee

-vs-

PAUL J. BETTS

Defendant-Appellant

Supreme Court No. 148981

Court of Appeals No. 319642

Lower Court No. 12-62665 FH

MUSKEGON COUNTY PROSECUTOR

Attorney for Plaintiff-Appellee

STATE APPELLATE DEFENDER OFFICE

Attorney for Defendant-Appellant

**SUPPLEMENTAL AUTHORITY
PURSUANT TO MCR 7.212(F) AND MCR 7.312(I)**

On February 14, 2020, the United States District Court for the Eastern District of Michigan granted declaratory and injunctive relief in *Does #1-6 v Snyder* (“*Does II*”), Eastern District of Michigan Docket No. 2:16-cv-13137 (Cleland, J.) *Opinion and Order*, attached. The court held that no provision of Michigan’s Sex Offenders Registration Act (SORA) may be enforced against those whose offenses occurred before April 12, 2011, that the unconstitutional amendments to SORA are not severable, and that no prior version of SORA can be revived. *Opinion and Order*, attached at 10-25, 30. The court also enjoined the State from enforcing several

previously-declared unconstitutional portions of SORA against all those individuals who are required—or will be required—to register. *Opinion and Order*, attached at 25-27, 30-31. The court allowed a 60-day window for the judgment to take effect to allow the Legislature to enact a new statute. *Opinion and Order*, attached at 29.

The court discussed Mr. Betts' case in the opinion. *Opinion and Order*, attached at 8-17.

Respectfully submitted,

STATE APPELLATE DEFENDER OFFICE

/s/ Jessica Zimbelman

BY:

JESSICA ZIMBELMAN (P72042)

Assistant Defender

200 North Washington

Suite 250

Lansing, MI 48913

(517) 334-6069

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