INTRODUCTION

I am a federal prisoner currently serving six years on a first-time offence. I would like to make it readily apparent that this submission is not an unfounded or uneducated assessment of the penal system. I will be giving situational, emotional, and physical context and by extension, my biases, so that my words may not fall on deaf ears. Following this, I will give a detailed account of my individual experiences, the changes in prison I observed while serving time, and how they have impacted my life within a framework to express the priorities that I would like to see with respect to federal penitentiary reform going forward. These experiences include the dehumanization of prisoners, the traumatic events that occur in a hostile environment and the overwhelming sense of helplessness at the hands of the prison officers who have been given complete dominion over human life. Although the quantity of issues that need to change are numerous, I would say that the top ten on the list are the lack of pardons, the proliferation of mandatory minimum sentences, food inadequacies, health care issues, delays with regard to parole, the lack of intellectual stimulation from a lack of access to resources/hobbies/education, the broken prisoner grievance system, the lack of psychological resources, the lack of accountability, and the attitudes of prison officers.

BACKGROUND INFORMATION

To begin, I would like to provide both situational context and openly present any biases I may have. As we are all the sum of our experiences, I will leave it to you to reflect upon these biases as you read my account. I will begin the context with some background information. I am a Dalhousie University graduate with a double major in English and philosophy. I was accepted into both a master’s degree in education, as well as Dalhousie Medical School. I have traveled the world teaching English as a second language to kindergarten, elementary school, middle school and university students. I have never so much as missed a bill in my life, never experimented with drugs and have never even been drunk. I have committed exactly one crime in my life, when I temporarily lost
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the ability to feel emotion and had heightened suicidal ideations. Up to this point I was a fully law-abiding citizen with a $64,000 scholarship to medical school. Despite this, and no criminal record, I was denied bail twice, remanded for eleven months, and tried by the same judge that denied me bail. I was told by my lawyer that I would be given four years, but ended up with a six-year federal sentence due to a mandatory minimum sentence created by the Harper government. Three years later, I am up for parole and I am overwhelmed with anxiety at trying to piece together a life that has been shattered by not only my actions, but also the judicial and penal system. I am unable to ever get a pardon and pursue my dream of being a neurosurgeon for the IWK due to Harper imposing longer time-frames and stricter rules for pardons. I cannot travel to many countries, be a teacher any longer or even get a job at McDonalds with a criminal record. Thanks to Harper’s punishment agenda, I will forever be defined by a single action, not a lifetime of achievements.

As for the emotional context, I was diagnosed with “extremely, severe Post Traumatic Stress Disorder” as a direct result of this penal system. I would like to note that the psychologist thought that a single adjective was not sufficient to describe my diagnosis. I have been diagnosed with severe depression, severe anxiety disorders, and I have developed fibromyalgia as a direct result of the inhumane, traumatic, and dehumanizing experiences given to me as a gift-wrapped present from “Corrections” Service Canada. I am unable to function on a daily basis without excruciating pain and have a strong desire to end my own life as a direct result of this legalized torture every day of my incarceration. Thanks to Harper’s agenda, an aspiring neurosurgeon will be reduced to living on welfare because I am unable to function as a normal citizen in the Canadian workforce with these mental and physical conditions.

Finally, I would like to provide physical context and the biases that are associated with this. I was remanded for eleven months in a supermax provincial jail, did the mandatory ninety days in a maximum-security environment at Springhill Institution, and was finally placed in a medium sector facility at Dorchester Institution with a strong indication that being placed in a minimum-security facility was in my immediate future. This never occurred. I have no institutional charges, thus I cannot speak about a segregation experience. I was deemed, and I quote, “too normal and
socially well-adjusted for a rehabilitation program and it would do [me] more damage than good”, so I cannot speak about the formal component of rehabilitation.

Therefore, it is with this prelude that I give you the situational, emotional, and physical contexts and biases already discussed as a basis to weed out the inevitable cynicism that will follow from my position. Despite this cynicism, I will try to the best of my ability to give a grounded and accurate account my experience of the Canadian penal system and the reforms that I would like to see.

**ISSUES**

**Lack of Pardons**
The first item that I would like to see immediately reviewed and changed is the pardon system. It was originally intended to allow people to not be defined by a single action and provide them with an incentive to work towards making amends by becoming a law-abiding citizen who contributes to society. Today’s system is a mockery of those once proud ideals as the Harper government continually tore it apart so that it is nearly impossible to obtain. Many of the criminalized are no longer even potential candidates for a pardon and even if they are, the amount of time it takes to obtain a formal pardon would usually put one well into their golden years. In my situation, I would like to reiterate that not only did I once have grand dreams, but I am not a candidate for pardon. I have a schedule 1 offence with violence and so I am immediately precluded from a candidate position to obtain a pardon. This means that for the rest of my life, the best I can hope to achieve is mediocrity. Where is my incentive to contribute to society? Where is my incentive to not commit an offence again? Do we want a society where an individual is defined by a single action and their only deterrence for not committing harm is prison? Given that positive reinforcement works exponentially better than negative reinforcement, I would like to believe that if I do well and help my society that I could be forgiven by my country for what I have done and perhaps even be a doctor someday. If I am being bold, perhaps even a neurosurgeon. Therefore, what I would like to see change is a shorter time frame on pardons by at least half and, more importantly, no discrimination against particular types of offences so that anyone has incentive to work hard for their country’s forgiveness.
A Review of Mandatory Minimum Sentences
Second, a review of the mandatory minimum sentences that the Conservatives imposed during their three successive mandates is sorely needed. We should trust our courts to be able to discern what level of punishment is appropriate and not have them bound to give someone a mandatory sentence for something that can be rectified in other more meaningful ways. We are sending a mixed message to the public by binding judges to these minimums. We are saying to trust the courts with applying the law, while at the same time undermining the judicial system by not allowing a judge to impose the sentence they deem adequate. In my case, what I needed was a psychologist and a friend, not six years in a traumatic environment. Had the judge been able to make the decision to give me a year or two, I would have experienced much less trauma and would have most likely not have developed the mental and physiological issues I have today as a result of repeated exposure to the prison subculture that I had never even known existed. Therefore, many, if not all mandatory minimum sentences should be abolished.

Food Inadequacies
Third, the food needs to be reviewed. On paper, we are eating chicken cacciatore and meat pie. In reality, we are eating shards of processed chicken in a sauce that could not be described as revolting due to the glaring inaccuracies of this statement and a pie that is 80 percent fake potatoes and some spaghetti sauce. I need not say much on this topic. In my personal experience, I have found numerous pieces of plastic and metal in my food, several bugs and have gotten food poisoning twice. I have also thrown up immediately after eating and as of now I eat almost exclusively bread, which consists of approximately 40% to 50% of our daily calorie intake. I do not need to express what this kind of malnutrition practice can do to a human body. We get fatter, while at the same time being malnourished. There are other animals in the animal kingdom that we do this to as well and their back fat makes a great burger taste better. What I would like to see moving forward are two things. First, I would like the food to be reviewed so that there are discernable pieces of meat in our food. Second, I would challenge the Attorney General of Canada Jody Wilson-Raybould and Public Safety Minister Ralph Goodale to eat a single lemon chicken or chicken cacciatore meal from this institution without vomiting. That action would only need to be done once to spur necessary reforms in this area.
Healthcare System (Inadequate and Delayed Care)
Fourth, the healthcare system or perhaps a lack thereof would be more accurate, needs serious attention. In my experience, it is nearly impossible to see a doctor, dentist or any specialist. For instance, it took me five months to see a doctor and an additional eleven months after seeing a specialist to get a diagnosis for fibromyalgia. Then, I waited an additional two months to be medicated. During this time, I submitted dozens of requests, complaints, grievances and final level grievances, placed calls to the Correctional Investigator, and wrote letters to human rights organizations, the Minister of Justice, and the College of Physicians and Surgeons. Only the College of Physicians and Surgeons responded. I was in pain every single day waiting for a diagnosis and now that I am medicated, I have not seen a doctor since to adjust my medication even though the neurologist specifically stated that follow-up with these substances was essential. The exact wording from the doctor when I finally did see him was “with the way this system is you won’t get close to a proper treatment for your condition”. I was and remain appalled. That statement alone says everything that is needed about the system when the people that work in it recognize its immense failure. Going forward, I would like to see more doctors that are easier to access, much more frequent dentist and optometrist clinics, and most importantly, a total scrapping of the necessity to see a nurse first before seeing a doctor. Nurses are not qualified to make a diagnosis or prescribe medications so this is simply job creation, creation of paperwork, and as a direct result, a drain on the system as a whole. I am a Canadian citizen, a human being and I am entitled to equal health care, but what we receive in here is not even a shadow of what health care should be.

Delays with Respect to Parole or Escorted Temporary Absences (ETAs)
Fifth, postponements associated with parole and escorted temporary absences (ETAs) is getting to the point where most people only believe these things to be a myth. The Parole Board of Canada (PBC), as a neutral third party is rarely the culprit, but rather it is the parole officers and the lack of speed within the system that are the primary causes for delays. I would like to state at this juncture that I had a parole officer that
was fairly decent and so I cannot speak personally to the kinds of horror stories that plague this institution. However, even I, with the best parole officer in this institution, was still subject to two postponements of my parole due to not being able to speak to a psychologist, which is now mandatory before a parole hearing. Most parole officers tell you to try for day parole on your full parole eligibility date and I myself have been told this, but does this not defeat the purpose of the eligibility dates? If you are only supported on your full parole date then why even have a day parole eligibility? I am sure you will be regaled with tales of parole officer nightmares, or as we call them stat officers, because many are kept until their statutory release dates once two-thirds of their sentences are served. Even though they have completed their mandatory programs, their parole keeps getting pushed back. I am inclined to believe the age-old wisdom that one or two people may lie, but when dozens are saying the same thing, there is probably some truth to it. That being said, my negative experiences were minor and I was lucky that only two small postponements happened, which should speak volumes about what the system is like. The CSC study R-193 titled “Waivers, Postponements and Withdrawals: Offenders, Parole Officers and National Parole Board Perspectives” states “The proportion of federal full parole pre-release decisions delayed or cancelled increased from 55% in 1998/99 to 62% in 2007/08”.

These kinds of statistics are outrageous as it is well researched and documented that prisoners who are released on parole have a substantially larger chance of success that decreases proportionally with the amount of time spent unnecessarily incarcerated. This is colloquially known as “warehousing” and became a common practice under Harper’s reign. The reality is that parole officers are overworked and cannot see everyone they need to or do everything they need to in a timely manner, while the mandatory psychology programs are often beyond capacity leaving people to wait to finish their programs before applying for the six months it takes to get a parole hearing. What I would like to see going forward is more prisoners getting out on or near their eligibility dates in order to facilitate rehabilitation by reducing time spent incarcerated and cutting down the more than $100,000 per year it takes to house each one of us in federal penitentiaries for men.
Lack of Intellectual Stimulation and Personal Development

Sixth, the ability to better oneself through access to resources, hobbies or education is very near to non-existent. I cannot speak about other institutions, but ours has not had a hobby shop in over four years. The same can be said about resources such as access to the internet or access to education. I realize that these may be three very different things, but they all share at least two common threads: intellectual stimulation and the ability to better oneself. Even though the Commissioner’s Directives are very clear about being entitled to “resources that are equivalent to a public library” and the right to education, the reality is our library is infrequently open, only recently have we been able to request heavily monitored internet searches, and the “school” we have not only had unqualified ‘teachers’, but the curriculum past grade 9 is almost non-existent. As a tutor for seventeen months at my institution, I observed how countless students were fully prepared for a provincial exam based on the material we had available only to nearly fail the exam because the ‘school’ had the wrong book. This, along with other penitentiary school inadequacies, not only undermines prisoner pursuits of high school diplomas, but also hurts the chances of those who have the potential to go onto post-secondary education. This, along with the fact that hobbies are non-existent make an already dull and intellectually sterile environment feel like Dante’s final circle of Hell – frozen in time. How are prisoners supposed to better themselves if the ’school’ is a farce and there are no resources or hobbies to improve one’s mind or skills? Going forward, I would like to see hobbies re-implemented full scale, better access to internet resources and most importantly, a complete reform of the ‘school’ here to be coordinated with the provincial curriculum and standards, as well as availability of post-secondary education.

Broken Prisoner Grievance and Redress System

Seventh, the prisoner grievance system is broken. I will not put lipstick on a pig and say anything other than the prisoner redress system is utterly useless. To get a response, I frequently write two requests dated fifteen days apart and a complaint dated at the end of those thirty business days, mark those dates on my calendar, and wait several months for a response. This is not an exaggeration. I have gone to the initial grievance level to
get deodorant from Inmate Supplies. I have waited nearly two years to be diagnosed with a problem that a quick Wikipedia search would have aptly provided an answer to. I have two grievances in now that, without any exaggeration once again, have had an extension filed for the extension taken to process the grievance. I was supposed to receive an answer in July 2016, the last extension I received was in December 2016 saying an answer was expected in January. It is now March 2017. This system is so broken that they cannot get an extension for an extension filed on time on two different grievances. Furthermore, I cannot file a final level grievance to Ottawa until the grievances at this initial level are responded to. I have tried to send one via government mail, but the mailroom opened the letter and returned it to me saying that prisoners are only allowed to put in final level grievances through the system after the procedure has been followed. However, if they control that process with no external accountability checks and refuse to answer, then we prisoners are completely at their mercy in the hopes that they will do their jobs without any accountability or consequences. What I would like to see going forward is a complete dismantling of the prisoner redress system and another system implemented by third party that is given some authority over at least a portion of CSC in an otherwise unaccountable system. This is a dream, however, because if Canada is not willing to sign the United Nation’s Optional Protocol to the Convention Against Torture and other cruel, inhumane, or degrading treatment or punishment (OPCAT) they are certainly not going to yield any of their totalitarian and tyrannical reins of power to a third party that allows prisoners to be empowered by expressing their concerns or fighting for their rights all while getting results. Therefore, a more realistic desire going forward would be to have a grievance clerk that is in an openly accessible area such as the library or the Inmate Committee office with a direct link to Ottawa that can be used once the initial level grievance has passed its expected response date so we are not entirely at the mercy of CSC’s benevolence or lack thereof.

MAJOR ISSUES

Severe Lack of Professional Psychological Resources
Eighth, and the beginning of the three major issues I have identified, is the serious lack of psychological resources. At present, we only have three
psychologists and one psychiatrist for nearly 500 prisoners. Such lacking resources has consequences. For instance, I had a single objective on my correctional plan, which was to participate in psychological intervention. It took eleven requests (nine of which went unanswered), three complaints (two unanswered), one grievance which is still not answered despite having finished counseling in full, and several calls to the Correctional Investigator all within a period of eleven months to be able to be seen by a psychologist, which CSC said was what I needed to be doing to be rehabilitated. I did not qualify for a formal program and I was months away from my full parole date before I was seen by a psychologist. Moreover, I had to postpone my parole twice because it took so long. With numbers like these, why are there only a handful of psychologists and one psychiatrist, neither of which most prisoners ever see? This is an unacceptable system especially since the vast majority of prisoners either need or would benefit greatly from psychological intervention. Also, by extension, society benefits as we are spending less by releasing prisoners early, rehabilitating them which adds to public safety, and reducing recidivism rates, further improving both public safety and incarceration spending. What I would like to see moving forward is a drastic increase in mental health funding for federal penitentiaries so that every prisoner who needs it can benefit from personalized psychological sessions so the issues that caused them to commit offences in the first place can be dealt with. Also, to be clear, I do not want a half-baked attempt for political publicity so that each prisoner gets one hour with a psychologist. I want to see a devotion to genuinely helping prisoners by getting psychological intervention at least once a week for the duration of their stay for those who need and want access to such support. Psychological issues are not fixed overnight or in an hour and they are also not fixed by programs where unqualified facilitators give us abstract tools to use as the current Integrated Correctional Program Model ICPM (CSC’s formal program)4 likes to believe. We need professional psychological help to aid in addressing the issues that led us here to begin with, otherwise known as actual rehabilitation.

Zero Accountability from Correctional Service Canada

Ninth, and in my opinion the very foundation of nearly every issue I have discussed, as well as many more I have not, is the lack of accountability
within CSC. What other Canadian government agency is completely self-governed, has its own set of laws, is veiled in shadows from the public eye, and is so close to above the law that they can kill human beings with little to no consequences? What other Canadian government agency is its own self-contained fiefdom that that needs not be accountable to any other organization? Who thought that any Canadian government agency having the ability to regulate themselves was a good idea? If you have not already, look at the Correctional Investigator’s reports year after year stating that the system needs serious attention, which are all ignored by CSC. Look at the John Howard Society of Canada and Canadian Association of Elizabeth Fry Societies reports time and time again. Look at the senseless deaths of prisoners that could have been easily prevented or the millions a year in lawsuits against the institutions all without meaningful consequences and little to no media coverage as they sign non-disclosure agreements for settlements. All these organizations have no bite to back up their bark as CSC is accountable to nobody under the vague and ambiguous guise of “the interest of public safety”. These words absolve them of any responsibility and people just accept this as standard practice for their protection. In other words, CSC is given dominion over human life and are beholden to nobody with no consequences or accountability to anyone but themselves for their actions. All these organizations recognize serious problems, but can do nothing other than make recommendations that CSC can choose to ignore. Could you imagine a company not being accountable to their shareholders? Could you imagine a government not being accountable to its people? I can – it is called Correctional Service Canada.

I was once asked by my friends what prison was like. Since I am the only person I have ever known that has gone to prison, I had to reflect a long time about this. The next time we spoke, I told them prison was like Chinese water torture. Any given droplet is of no concern, but 10,000 of them consecutively will drill a hole through your skull. Likewise, it is not always the murder and the covering up evidence before the RCMP investigate it that is the main issue, but rather the excessive use of force, the inhumane nine-day lockdowns without showers or phone calls, the 28-hour periods between meals on lockdown, the malicious act of leaving the lights on all night or kicking doors at 3:00am, the shutting off of
water or toilets, the mysterious absence of video footage when an officer pummels a prisoner, and the mind-numbing lack of anything productive to do, all of which go mostly unnoticed and undocumented, which are the issues. What people do not understand is, like Chinese water torture, every condescending comment, every unanswered request, every time the phones are mysteriously shut off even though the guards have access to turning them off and on, every bite of uneatable food, every restless night on a half inch piece of foam on metal, every ‘random’ search, every ‘Rec on the range’ for the third time this week without cause, every refusal to answer you by the guard when you need something, and every flashlight in the eyes every hour on the hour, are droplets that start to drill a hole through your skull. All the while, you have no real power to address any issue because no organization you contact – assuming the mailroom allowed the letter to go through as they do not like their secrets to leave the walls – can do anything but make recommendations. These ‘minor’ issues culminate together over years are the real culprit of insanity behind bars. This breeds a hostile, dehumanizing, traumatic, and helpless environment where most prisoners feel completely defeated, un-empowered to change their situation and devoid of any hope. As an example of this, when the Supreme Court of Canada made their ruling that physician assisted suicide was legal, several prisoners talked about it in a genuinely excited manner as a potential escape from the daily misery created by those droplets. It was such a large deal that the Inmate Committee actually looked into it and posted information on the walls due to the volume of people curious to see if they could qualify. Several letters were sent to Dying with Dignity Canada. None were answered. This is the hopelessness and helplessness that the lack of accountability breeds as the public seems to forget we are still humans and Canadian citizens too.

What I would like to see moving forward is a third-party organization that is not affiliated with CSC that has federal mandate to oversee at least some of the components of the organization and have jurisdiction to implement necessary changes. Ideally, there would be a process to formally petition this third party as prisoners to address issues as they arise. Secondly, I would like to see the veil of secrecy cloaking CSC lifted by allowing the media and public access to see the daily workings of the institutional life so they can be made aware of these serious issues.
Finally, I would like to see Canada not only sign the UN’s *OPCAT*, but to be subject to surprise visits by the UN and this third party so as not to give them time to prepare a picture-perfect view of the system as is currently the case with the Correctional Investigator. The prisoners can always tell when the inspectors are here because the food gets substantially better and we get double portions. This is a running joke within the institution, which is why only surprise visits will suffice.

**Attitudes of Correctional Officers**  
(*Psychological Screening or Retraining*)

Tenth, and finally, a serious screening process for correctional officer’s psychological make-up or retraining for officers every few years is sorely needed. I would like to admit at this juncture that not every guard I have met is malicious or vindictive. In fact, there are four of them that are decent human beings. The other several dozen that I have encountered fall into exactly two categories which, after all you have read, I am sure you could hazard a guess. These categories are bullies and those who have been bullied. The bullies are tolerable. A few kicks to the door and some sneering usually fills their need to diminish or dehumanize others, and it is usually left at that. Those who have been bullied are something else altogether different. You would think after experiencing bullying themselves that they would be empathetic to those who have been stripped of their freedom, liberty and individuality. Yet it seems their need to expend all the years of repressed anger outweighs their empathy. These are the ones that are most dangerous. These guards go out of their way to belittle, traumatize and dehumanize as many prisoners as possible. They resort to violence quickly and prisoners cannot ask anything of them without walking on eggshells. I have personally been beaten for “being too smart” and therefore insubordinate. It was never written-up or documented, and to this day I am not even known to the security team in any negative capacity due to excellent behavior in the institution, yet I was a victim of an undocumented assault without cause. Two prisoners have human rights complaints in on this correctional officer and yet he is still on the same range as us working as if nothing is happening. If you look for the guards with the most frequent complaints against them, you will find those who have been bullied. According
to the CSC study R-44 titled “Attitudes of CSC Correctional Officers towards Offender” done in 1996, “23.3% of CO’s [correctional officers] exhibit empathetic views of prisoners, 76.2% held punitive views of corrections, and 53.6% supported rehabilitation”. That was two decades ago and before Harper’s ‘law and order’ agenda implicitly supported the idea that you go to prison for punishment, not as punishment. This means that more than 20 years ago over three-quarters of correctional officers believed they were here to punish us and over half do not support rehabilitation! We cannot allow people who have such beliefs have unaccountable dominion over human life.

What I would like to see moving forward is a clear mandate for CSC to prioritize rehabilitation in practice, not just in theory, and provide the subsequent training necessary to implement this new shift in mindset. Our punishment is being stripped of our liberty not being beaten, physically or mentally, for any reason. We need to put the “correction” back into “correctional” officer. Secondly, I would like to see a battery of psychological tests for every officer before ever being allowed to set foot in a federal institution.

CONCLUSION

CSC implements barbaric practices of mental and physical torture in a dictatorship-like environment with zero accountability to anyone but themselves, and has a long way to go before it can confidently say it belongs in one of the most free and progressive countries on earth. Ideally, the system needs to be completely remolded as our intoxication with incarceration as a solution to our problems is outdated and detrimental not only to prisoners, but also to public safety as these people are getting out and often without being properly rehabilitated. Problems such as a lack of pardons, mandatory minimum sentences, food inadequacies, health care issues, postponement of parole, lack of intellectual stimulation from a lack of access to resources/hobbies/education, the broken prisoner grievance system, the lack of psychological resources, the lack of accountability, and the attitudes of correctional officers will continue to plague this system as captives are dehumanized, traumatized, and overwhelmed with a sense of helplessness all while CSC looks good on paper. CSC’s mission statement states, “The Correctional Service
Canada (CSC), as part of the criminal justice system and respecting the rule of law, contributes to public safety by actively encouraging and assisting prisoners to become law-abiding citizens, while exercising reasonable, safe, secure, and humane control”. It sounds pretty does it not? If Prime Minister Justin Trudeau and the Liberal Party truly believe in an “open and accountable government”, they need to turn their gaze to where a blind eye has been turned for decades – the federal penitentiary system. I was once a proud, world-traveling Canadian wearing our flag everywhere, but I have been rendered unable to feel anything but ashamed of my country due to this experience and the knowledge that my nation will never forgive me with a pardon for what I have done regardless of how much I try to make amends or give back to society.

ENDNOTES

1 The IWK Health Centre is a hospital in Halifax, Nova Scotia that provides care to women, children, and youth from Nova Scotia, New Brunswick and Prince Edward Island (IWK Health Centre, no date).


3 According to the website of the United Nations Human Rights Office of the High Commissioner (OHCHR), Canada is not listed as a member of the human rights council. The OHCHR website also provides a map of all countries which are (a) state party, (b) signatory, and (c) no action. Canada is listed as “no action” as of April 2017 (United Nations Human Rights Council, no date).

4 Integrated Correctional Program Model (ICPM), which was introduced as part of CSC’s modernizing and streamlining of programs and services. This consolidated all of CSC’s core programs into one ongoing program that is designed to target the “risk” of all prisoners.

5 “Rec on the range” refers to a modified routine that CSC implements in incidents like lockdowns. Under this routine, prisoners are not confined to their cells, but must remain on the unit and are not permitted to attend the yard of have any other movement throughout the institution. This operating procedure was in keeping with the former principle of the Corrections and Conditional Release Act (CCRA) that the “least restrictive measures” must be used.

REFERENCES
