



# Sacramento County District Attorney's Office

**ANNE MARIE SCHUBERT**  
District Attorney

Stephen J. Grippi  
Chief Deputy

Michael A. Neves  
Assistant District Attorney

Non-Violent Parole Review Process  
Board of Parole Hearings  
Correspondence-NV  
Post Box 4036  
Sacramento, CA 95812-4036

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**Re: Paradise, Toby**  
**CDCR No. AW6805**  
**Court Docket No. 14F00278**

Inmate Paradise has been a sophisticated and violent criminal for years, his performance on parole has been abysmal, and he should not be released until he establishes a lengthy and sustained record of rehabilitation.

In 2013, Inmate Paradise was being supervised on post-release community supervision (PRCS) in Sacramento. When his probation officer advised Inmate Paradise that he was going to be violated for not complying with his terms and conditions, Inmate Paradise threatened the officer with violence. As a result, Inmate Paradise was convicted of criminal threats pursuant to Penal Code Section 422, a strike under California law. However, before being apprehended for threatening his probation officer, Inmate Paradise became the subject of a drug sales investigation.

In 2014, while wearing a GPS monitor, Inmate Paradise was tracked on multiple occasions to an address he did not disclose to the Probation Department. At that address, officers found 6 ounces of cocaine base packaged for sale and a loaded .380 semi-auto handgun. Simultaneously, officers conducted a traffic stop on Inmate Paradise. A search of his vehicle revealed \$10,000 in United States currency and two magnetic boxes affixed under his car. One box contained a small quantity of narcotics. Inmate Paradise's conduct shows his total disregard for the rule of law, and his complete lack of interest in rehabilitating himself.

The 2013-2014 period was not a period of aberrant behavior for Inmate Paradise. Instead, it was a continuation of a life of crime. From 1993-2012, Paradise was convicted of 8 felonies and 6 misdemeanors stemming from at least 10 different cases. In that span, Inmate Paradise rarely went a full calendar year without committing a new offense or a violation of his probation/parole. Several lengthy stays in California jails and prisons did not rehabilitate Inmate Paradise or deter him from living a criminal lifestyle. Instead, he became an armed mid-level drug dealer, undeterred by GPS monitoring and willing to threaten his probation officer when it suited him. The citizens of California passed the Three Strikes Law to enhance and lengthen criminal sentences for people like Inmate Paradise. Given his consistent anti-social behavior and his unwillingness to abide by the terms of supervised release, Inmate Paradise should not be released until his rehabilitation has been conclusively established.

As we are given 30 days to respond, and we are not provided with any disciplinary history or any other information aside from the one page notice of parole review, I cannot comment on Inmate Paradise's prison conduct. However, from the record that is available it is clear that Inmate Paradise should not be released as he poses a significant, unreasonable risk of violence to the community. Parole should be denied.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Matt Chisholm", followed by a long horizontal line extending to the right.

Matt Chisholm  
Deputy District Attorney  
Sacramento County District Attorney's Office