

Appellant Troy Benjamin Wragg  
Inmate No. 67165-019

Pro Se Litigant

UNITED STATES OF AMERICA

v.

TROY WRAGG

UNITED STATES DISTRICT  
COURT FOR THE EASTERN  
DISTRICT OF PENNSYLVANIA

CRIMINAL DOCKET

CASE NOS.:

2:15-00398 & 2:18-00465

**SUPPLEMENTAL BRIEF FOR THE RECONSIDERATION OF THE EMERGENCY**  
**MOTION FOR COMPASSIONATE RELEASE PURSUANT TO 18 U.S.C. 3582**

December 22, 2020

Pro Se Litigant Troy Wragg now files a sixth important supplement to his  
Reconsideration for Compassionate Release.

The purpose of this supplement is to alert the court of two crucial matters:

1) **Troy Wragg's Health**

Mr. Wragg is still suffering daily from the effects that the *two* Covid-19 infections have had on his body. For the avoidance of doubt, it was stated in the Reconsideration (and as part of the five supplements prior to this) that Mr. Wragg tested negative after his first Covid-19 infection on November 16<sup>th</sup>, 2020. Then, given the lack of preventative measures at FCI Fort Dix, Mr. Wragg tested positive for a second Covid-19 infection only two days later. The second Covid-19 infection, that he currently still has, is far worse than the already vicious infection that

Mr. Wragg had the first time. Medical staff have stopped tending to the sick inmates in Building 5812, only because they have had severe outbreaks throughout the entire prison, which is America's largest federal prison. Mr. Wragg still coughs up blood daily, has long and painful grandmal seizures several times a week, and can barely get out of bed without assistance, and given his extreme fatigue body aches, coupled with his labored breathing- he can shower only twice per week. Furthermore, he still remains wheelchair-bound, thereby immediately qualifying him for Compassionate Release on the grounds of Program Statement 5050.50 of the First Step Act, on top of all additional qualifying factors. Additionally, it is important to note that despite being seen by outside Neurologist Dr. Wagner and having a follow-up appointment scheduled with him as it pertains to the doubled medications and wheelchair he prescribed, this appointment has been cancelled for no reason, providing Mr. Wragg with no chance to receive proper medical treatment or relief of any sort. Lastly, Mr. Wragg has *only* been given a new antibiotic as his only relief during this second infection. It has provided no relief.

## 2) **The Massive COVID-19 Outbreak at FCI Fort Dix**

The wildfire of medical injustice continues to rage throughout America's largest federal prison. It is official now that 10 of the 16 housing units (62.5%) are under completely quarantine. The number of infected staff has topped over 50. The number of inmates infected is unknown because authorities have limited and/or stopped testing in the majority of the housing units, including Building 5812 (which hasn't been tested in 34 days). Furthermore, the East compound has been hit with a strain so severe that it has caused 12 inmates to be hospitalized on ventilators. Given that correctional officers are shared between the East and West compounds during the pandemic, it is very easy for this transmission of the deadly Covid-19 virus to reach Mr. Wragg for a third time.

**Conclusion**

The Court must finally take true emergency action and help save Mr. Wragg's already terribly diminished life by granting Compassionate Release immediately. The Court is taking an unnecessary liberty with Mr. Wragg's life by taking excessive time with a true life or death matter.

As the Court knows, the Third Circuit has stayed Mr. Wragg's second appeal attempt, pending the decision of this Court on his Reconsideration. We implore the Court to do the right thing, given the plethora of evidence we have provided, starting back in May of this year, and grant Mr. Wragg's Compassionate Release immediately and allow him the opportunity to get proper medical care, like any other human being. If the Court wishes to again ignore the evidence and rule against Mr. Wragg based on the BOP's altered medical records, as well as assumptions and biases, then we humbly request that the Court rules promptly so we can continue his appeal remedy.

Thank you kindly in advance for your prompt ruling on this matter.

Respectfully submitted,

/s/ Troy Wragg

*Pro Se Litigant*

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**From:** Megan Hallett <meganchallett@gmail.com>  
**Sent:** Tuesday, December 22, 2020 1:40 PM  
**To:** PAED Documents  
**Subject:** Pro Se Filing for Troy Wragg Criminal Docket NO.: 2:15-00398 and 2:18-00465  
**Attachments:** Troy Wragg- Supplemental Brief 12-22-2020.pdf

**CAUTION - EXTERNAL:**

Good afternoon,

I am writing on behalf of Pro Se Litigant, Troy Wragg. Attached is his Supplemental Brief for the Reconsideration of Compassionate Release: Criminal Docket NO.: 2:15-00398 and 2:18-00465 to be electronically filed.

Thank you so much for your assistance and have a great day.

Best regards,  
Megan Hallett Wragg  
(302) 824-2975

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Megan Hallett Wragg

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