

**STATE OF RHODE ISLAND**

**PROVIDENCE, SC.**

**SUPERIOR COURT**

**STATE OF RHODE ISLAND**

:

:

**V.**

:

**Case No.: P3-2021-0533A**

:

**RICHARD GORDON**

:

**NOTICE OF SENTENCING ENHANCEMENT PURSUANT TO THE RHODE ISLAND  
HATE CRIMES SENTENCING ACT**

Now comes the Attorney General of the State of Rhode Island and pursuant to Rhode Island General Law § 12-19-38, as amended, hereby gives the following notice:

- (1) The above-named defendant has been charged by complaint with one count of simple assault and/or battery, in violation of Rhode Island General Laws § 11-5-3(a), and one count of disorderly conduct, in violation of Rhode Island General Laws § 11-45-1(a);
- (2) That with respect to each count of the complaint, it is alleged that the above named defendant intentionally selected the person, Bahram Pahlavi, against whom the offenses were committed, or selected the property that was damaged or otherwise affected by these offenses, because of the defendant's hatred or animus toward the actual or perceived religion, color, race, national origin or ancestry of Bahram Pahlavi; and,
- (3) That upon conviction of one or both of these offenses, notice is hereby served that the defendant is subject to the imposition of an additional sentence pursuant to Rhode Island General Law § 12-19-38(c).

Respectfully submitted,

STATE OF RHODE ISLAND

PETER F. NERONHA  
ATTORNEY GENERAL

By: /s/ JOHN M. MOREIRA

John M. Moreira  
Assistant Attorney General

/s/ KEITH HOFFMAN

Keith Hoffmann  
Special Assistant Attorney General

**CERTIFICATION**

I hereby certify that a true copy of the within Notice Of Sentencing Enhancement Pursuant To The Rhode Island Hate Crimes Sentencing Act has been e-filed through the ECF filing system and is available for viewing and downloading and was mailed, postage prepaid, to Robert C. Corrente, Esq., Whelan, Corrente & Flanders, LLP, 100 Westminster Street, Suite 710, Providence, RI 02903, on this 2nd day of MARCH, 2021.

*Victoria Cabral*

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