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STATE OF RHODE ISLAND

NICHOLAS R. COTE
SIXTH DISTRICT COURT

STATE OF RHODE ISLAND

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V.

Case No.: 61-2020-06565

RICHARD GORDON

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

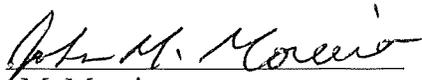
Now comes the Attorney General of the State of Rhode Island and pursuant to Rhode Island General Law § 12-19-38, as amended, hereby gives the following notice:

- (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, and 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

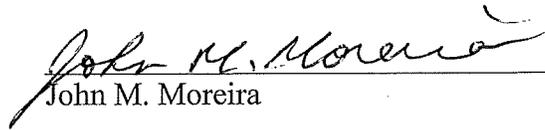
By: 
John M. Moreira
Assistant Attorney General

Keith Hoffmann
Special Assistant Attorney General

CERTIFICATION

I hereby certify that on the 11th day of August, 2020, I served counsel for the defendant, Matthew Dawson, Esq., with a copy of the Notice Of Sentencing Enhancement Pursuant To The Rhode Island Hate Crimes Sentencing Act by electronic mail at mdawson@lynchpine.com and first class mail at:

Matthew S. Dawson, Esq.
1 Park Row
Providence, RI 02903


John M. Moreira