

EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA

JOSHUA DUNN, et al.,

Plaintiffs,

v.

KIM THOMAS, in his official capacity as
Commissioner of the Alabama Department of
Corrections, et al.,

Defendants.

Civil Action No. 2:14-cv-00601-WKW-TFM

DECLARATION OF JOSHUA DUNN REGARDING RAZOR BLADES

DECLARATION OFJoshua Dunn

1. My name is Joshua Dunn, AIS# 240896. I am above the age of 19 years.
2. I am currently in the custody of the Alabama Department of Corrections ("ADOC").

3) I have been housed at St. Clair Correctional Facility since October 2012.

4) I was previously diagnosed with bipolar disorder. When I came into the ADOC at Kilby, I informed the psychiatrist of my diagnosis and that I was currently taking lithium. I asked to be taken off lithium and it was discontinued. The psychiatrist told me he would continue to see me to monitor how I was doing coming off the lithium. I have not seen any psychiatrist since then, except that the mental health personnel who let me off suicide watch at

4 (cont.) St. Clair may have been psychiatrists.

5) In August 2013, I was in segregation. I had several state-issued disposable razor blades in my cell. They had been given to me while I was in segregation.

6) I was having a crisis and asked to see mental health. No one came to see me. I asked for and received a new razor blade. I broke it out of the plastic shaft. I cut myself on my forearm using that razor blade. I showed an officer that I was bleeding. He threw his hands up in the air. About 45 minutes later, the guards came around to give out dinner. I showed the officer who was serving trays that I had cut myself. He said "I don't give a fuck. I got chow to serve." After chow was served, two officers came

6 (cont) and got me and took me to the infirmary. A nurse saw me, cleaned the wound and put staples over it. They then placed me in suicide watch.

7) I was in suicide for about 3 days. I did not receive any mental health care while in suicide watch. On the last day, someone from mental health came and saw me, asked me if I still suicidal, to which I answered no, and if I was safe to go back to my cell, to which I answered yes. She cleared me to go back to segregation. I received no follow up mental health visit.

8) I went back to my cell. It still had blood in it from when I cut myself. The razor I had used to cut myself was still in the cell, and the other razors were still there as well.

9) I was given a disciplinary for creating a security, safety and health hazard. Officer Marcano wrote me up because Lt. Northcutt told him to. No one from mental health participated in the disciplinary hearing. I lost 4 months of good time credits and ~~for~~ was given another month of disciplinary segregation.

10) I was in segregation until March 2014. I given razor blades the entire time I was in segregation.

11) On 4 subsequent occasions while I was in segregation, I cut myself with razor blades after asking for mental health care and not being given any mental health care.

12) On one occasion I was in suicide watch for approximately

12 kont) 2½ weeks. I never saw anyone from mental health during that stay or any other stay in suicide watch except for the person who came to clear me to go back to segregation.

13) The last time I cut myself was in early 2014. I had asked for mental health care, but not received any. At about 5:45 pm, I cut my wrist with a razor blade that I had broken out of the plastic shaft. I told the officer who was about to go off duty. He kept walking. I told the nurse who came for pill call and showed him my arm. He said they would get to me when they had time. At about 9:00 pm, Officer McQueen and Sgt. Hamilton came to get me. Sgt. Hamilton said "Why the fuck you keep cutting yourself on my shift?" Then he said "I'm going to break

13 (cont)... you from doing that " They handcuffed me behind my back and took me to the walk yard. Officer McQueen and Sgt. Hamilton came into the walk yard with me and started hitting me. They said a lot of things while they were hitting me. Sgt. Hamilton said the next time I cut myself he was going to "let [my] bitch-ass die."

14) Sgt. Hamilton and Officer McQueen left me in the walk yard until about 10:00 pm. I was still handcuffed.

15) Sgt. Hamilton and Officer McQueen took me to the infirmary at about 10:00. The nurse called the doctor and got authorization to send ~~me~~ ^{me} to the hospital, because I had severed one tendon and nicked another. The nurse did not examine me other than my wrist. I told the nurse about pain in my knee from the beating, but I could not tell her about the beating because the officers were standing there.

16) I went to the hospital. They gave me 12 staples to close the wound. I was then brought back and placed in suicide watch. Two days later, having received no mental health care, I was returned to segregation. The cell I was placed in had used razor blades in it.

17) Each time I was in suicide watch, I given a razor to shave in the shower and return afterwards. There was nothing to keep me from using the razor to hurt myself in the shower.

18) Currently I am housed in general population.

19) Razor blades are freely available. There is a guard shack where you can get razors. You can get double-edged razor blades of the kind you use on a metal shaft or single-blade disposable razors or both. The guard gives you as many as he feels like giving you, sometimes just a couple, sometimes several. You don't have to give your name or sign anything to get razors

19 (cont)... You don't have to turn in razors to get new razors.

20) At canteen, you can purchase double-blade disposable razors.

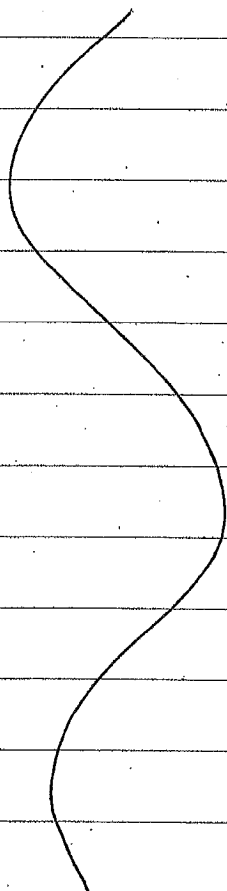
21) I have not seen any changes to the way razors are distributed and available since I came back to general population in March 2014. The only change I have seen is that the brand of two-edged razors available at the guard shack has changed.

22) I am aware of one prisoner who cut himself with a razor while in segregation about one month ago. This same prisoner has a history of cutting himself. In early 2014, probably January or February, he cut his throat with a razor. I believe he had to go out to a hospital.

23) I am also aware of a prisoner who cut himself with a razor in general population about a month ago. He too has a history of cutting himself.

24) Most prisoners have several razors in their possession at any time.

25) I am aware of people who have been assaulted with razor blades.



I declare under penalty of perjury that the foregoing is true and correct. Executed on August 20, 2014.

Signed: *Joel Dunn*