

# **EXHIBIT 45**

## I. INTRODUCTION

1. I am a former corrections administrator with nearly thirty-five years of experience working in and administering adult and juvenile institutions. Before becoming a corrections administrator, I held various line and supervisory level positions in a number of prisons and juvenile facilities in Washington State. I have served as the Superintendent (Warden) of 3 adult institutions, including facilities that housed maximum, medium and minimum-security inmates.

2. I served for seven years as the Deputy Secretary for the Washington State Department of Corrections (WDOC), responsible for the operation of prisons and community corrections. I briefly retired, but was asked by the former Governor of Washington, Chris Gregoire, to come out of retirement to serve as the Secretary of the Department of Corrections in the fall of 2007. I served as the Secretary for four years, until I retired in 2011.

3. Since my retirement I have served as an expert witness and correctional consultant for cases and issues in ten different states. Most recently I testified in Federal court in *Coleman v. Brown* in California and *Graves v. Arapio* in Arizona, both class action lawsuits. With both parties concurring in my selection, I was also appointed and completed a Special Master assignment for the judge in *Corbett v. Branker*, a case in Federal court in North Carolina. Attached hereto as **Appendix 1** is a true and correct copy of my resume, which lists my work experience, publications, and service as an expert witness. My billing rate for work on this case is \$150 per hour.

4. As a Superintendent, Assistant Director of Prisons, Assistant Deputy Secretary, Deputy Secretary and Secretary, I have been responsible for the safe and secure operations of adult prisons in the State of Washington, a jurisdiction that saw and continues to see a significant downward trend in prison violence. As an expert witness and consultant I have been called upon to address security issues in adult prisons in other states. I am experienced with sound correctional practice and I am familiar with the issues presented by razor blades in the prison facilities.

## II. ASSIGNMENT

5. Plaintiff's counsel asked me to evaluate and offer my opinion as to the practices regarding razors in the Alabama Department of Corrections (ADOC) prisons and the response by officials to the concerns raised by Plaintiffs about those practices.

### **III. FOUNDATION FOR EXPERT OPINION**

6. I considered information from a variety of sources in the course of my work, including certain ADOC policies, correspondence from ADOC's counsel dated June 6, 2014 addressing the "Razor Issue", an incident report for a suicide from 2011, as well as declarations of prisoners currently incarcerated in multiple ADOC prisons. A list of the materials provided to me by Plaintiff's counsel that I reviewed for this engagement is attached as **Appendix 2**, and may be referred to in footnotes and/or other citations within this report.

7. The opinions I render in this report were made with a reasonable degree of professional certainty. I reserve the right to update and modify my opinions if additional information and materials become available.

### **IV. EXPERT OPINION**

8. It is my opinion that the ADOC does not currently have an effective system to account for razor blades in their prisons resulting in a risk of serious harm for both prisoners and staff. Despite the assurances in the June 6, 2014 letter from ADOC counsel, over two months has passed and there has not been sufficient change in practice to protect the prisoners from the misuse of razor blades. This is not a complex problem and given the documented incidents of self-harm in the Plaintiffs' complaint, should be treated as an emergency and be corrected in a matter of weeks, not months.

### **V. DEFENDANTS ARE WELL AWARE OF THE PROBLEM**

9. The Defendants met with the Plaintiffs on May 20, 2014. At that meeting the Plaintiffs asked the ADOC to, "immediately address the issue of razor blades being freely available and entirely untracked in all facilities, including in Residential Treatment Units and for individuals who have recently attempted suicide with razor blades".<sup>1</sup> As a result of

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<sup>1</sup> Class Action Complaint for Declaratory and Injunctive Relief, June 17, 2014, page 25, paragraph 61

that request the Defendants' counsel, Alyce Robertson Allison, wrote a letter to the Plaintiffs dated June 6, 2014. The sole purpose of the letter was to address the "razor issue". In that letter three assurances were made. First, the ADOC will no longer use double edged razor blades and that any razor with a removable blade will not be issued in prisons with a Residential Treatment Unit (RTU). Second, that a group would be formed to develop a policy to address the use and issue of razor blades in ADOC prisons. And third, "Inmates in closed Residential Treatment Units, Stabilization Units, and on suicide watch will be issued plastic single-edge disposable razors only at shower time with the number of razors issued accounted for and collected immediately after showers".<sup>2</sup>

10. In January of 2011, an inmate at Limestone Correctional Center committed suicide with a razor blade. A nurse and a correctional officer discovered him in his cell. He was still alive when discovered but stopped breathing before an ambulance could arrive. He was taken to an outside hospital and was pronounced dead less than two hours later. An agency investigator searched the cell and retrieved the razor blade.<sup>3</sup>

11. In my experience an incident as serious as an inmate suicide would require an extensive internal investigation to determine the cause of the death and to determine whether or not any systemic problems existed that need to be corrected to make certain the risk of harm to the inmate population of a similar event occurring was lessened. Whether or not such an internal review occurred, over three years later it is clear from the documents I have reviewed that the ADOC has a serious and ongoing problem with controlling razor blades, particularly for their most vulnerable populations.

12. On June 17, 2014, the complaint in this case was filed.<sup>4</sup> The complaint further details the extent of the problem with razors and the resulting incidents of self-harm within the ADOC. Specific examples of the problem of razors and self-harm are

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<sup>2</sup> Ltr 06-06-14 Morris razors

<sup>3</sup> Incident Report-1-21-11

<sup>4</sup> Class Action Complaint for Declaratory and Injunctive Relief, June 17, 2014

referenced more than a dozen times in the complaint, involving at least six different inmates, including one actual suicide by self inflicted razor cuts<sup>5</sup>.

13. In my opinion, the information provided to officials within the ADOC is more that sufficient to require immediate and effective actions to stop the risk of harm to prisoners under their care and control.

## **VI. ADOC OFFICIALS HAVE FAILED TO RESPOND TO THIS EMERGENCY**

14. ADOC officials failed to develop and articulate a full solution to the problem of razors and self-harm in their prisons in their letter of June 6, 2014. The commitments they made in the letter are helpful but did not go far enough. First, they made no provision to collect razors that are already in the possession of inmates that have removable blades, including notifying inmates that these razors were no longer allowed or making sure that searches occurred to confiscate those that weren't turned in. Second, they failed to establish an effective procedure to have inmates turn in used razors, one for one, in order to get a new one. Finally and very significantly, they also made no provision to institute more secure and accountable practices for razors in their segregation units, an area known in every jurisdiction of which I am familiar to have a higher self-harm and suicide rate than in general population. In addition to the problem of suicide and self-harm, segregation units also often hold inmates with a history of assaultive behavior towards other inmates or staff. Strict control over razors for inmates in segregation is fundamental to good safety and security. At no time should an inmate in segregation be allowed to keep a razor in their cell.

15. I have reviewed declarations from inmates currently incarcerated in multiple ADOC prisons, dated July 9, 2014 through August 27, 2014.<sup>6</sup> The declarations come from inmates housed in segregation, mental health units and in general population, some who have a history of attempted suicide or self-harm with razors. Those declarations make

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<sup>5</sup> Class Action Complaint for Declaratory and Injunctive Relief, June 17, 2014, page 29, paragraph 76

<sup>6</sup> Complete list of declarations is listed in **Appendix 2**

clear that ADOC has yet to make even the changes promised in their letter of June 6, 2014. The inmate declarations further illustrate the depth and the extent of the problem with razors within the male prisons of ADOC.

16. I have reviewed several declarations from inmates at St. Clair Correctional Facility. Their description of current practices regarding razors is remarkably consistent. One of those declarations dated August 20, 2014 from an inmate at St. Clair who has attempted suicide with a razor blade five times since August of 2013 reports,

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. The guard gives you as many as he feels like giving you. Sometimes several. You don't have to give your name or sign anything to get razors and you don't have to turn in razors to get new razors.

At canteen, you can purchase double-blade disposable razors. I have not seen any changes to the way razors are distributed 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.<sup>7</sup>

17. Another inmate at St. Clair, with a history of suicide attempts with a razor, is assigned as a "runner". He reports that part of his responsibility is to pass out razors to inmates in segregation.<sup>8</sup> While I would encourage the practice of inmates having jobs while serving time in segregation, in modern times it is beyond what I have ever seen or heard of in any other jurisdictions to allow an inmate to pass out razors to other prisoners in segregation. It is reminiscent of the era of the inmate "con boss", an era that has long since passed in prisons systems around the country.

18. Several declarations were also submitted from multiple inmates at Bullock Correctional Facility, dated August 27, 2014. It is reported that the

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<sup>7</sup> Joshua Dunn Declaration, paragraphs 19-21

<sup>8</sup> Daletrick Hardy Declaration, paragraphs 5 and 11

“double-edge metal safety razors”, described in the ADOC letter to Plaintiffs’ counsel, and have not been collected.<sup>9</sup> They further report that razors are lying around in the dorms and that some inmates have multiple razors in their possession, some up to fifteen. Two inmates report self harm attempts with razors within the month.<sup>10</sup>

19. As of August 25, 2014 at Bibb Correctional Facility, the “double-edged metal safety razors”, while no longer issued, are still in population.<sup>11</sup>

20. As of August 6, 2014 at Easterling Correctional Facility, “Inmates can get replacement blades for mental (sic) screw on razors from officer cubicle”.<sup>12</sup>

21. As of August 1, 2014 at Limestone Correctional Facility, the location where the tragic incident of January 2011 occurred, it is reported, “There have been no changes in the process to obtain a razor blade. To get a blade, you go to the shift office and they give you a pack of 5 razor blades. You can also get them from the cube (control center) in the dorm”.<sup>13</sup>

22. As of August 8, 2014 at Donaldson Correctional Facility, a prison with a 300 bed segregation unit, it is also acknowledged that double-edged razor blades are no longer passed out but it is reported that, “No general shakedown of cells occurred to get all the metal, double edge blades, and many are still available.”<sup>14</sup>

23. As of August 7, 2014 at Staton Correctional Facility, “There is no process of collection of razor blades. Inmates can have as many razors as they want. There are no consequences for having multiple razors”.<sup>15</sup>

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<sup>9</sup> Jonathon Sanford Declaration, paragraph 8; Richard Businelle Declaration, paragraph 11; Robert Dillard Declaration, paragraph 11 and 12

<sup>10</sup> Richard Terrell Declaration, paragraph 9; Robert Dillard Declaration, paragraph 14

<sup>11</sup> John Maner Declaration, paragraph 7

<sup>12</sup> Marty George Declaration, paragraph 5

<sup>13</sup> Willie McClendon Declaration, paragraphs 9 and 10

<sup>14</sup> William Villar Declaration, paragraph 9

<sup>15</sup> Augustus Smith Declaration, paragraphs 7-9

24. As of August 6, 2014 at Ventress Correctional Facility, it is reported that, "In my dorm, sometimes officers place a box of 20 to 30 plastic razors in the dorm and inmates can get one or multiple razors at a time.... In my dorm, there is no process for collecting razors".<sup>16</sup>

25. As of July 9, 2014, an inmate at Holman Correctional Facility, a prison with a 200-bed segregation unit (where the inmate is housed) and an RTU says he has attempted to commit suicide four times since December of 2013. He goes on to say, "I am still given razors for shaving and they are not collected from me after showering. The practices at Holman in segregation with regard to razor blade distribution and collection have not changed in recent years".<sup>17</sup>

26. At Fountain Correctional Facility, on August 27, 2014 an inmate with a history of cutting himself, including attempts this calendar year, reports that there have been no changes in the issue of razor blades at that prison.<sup>18</sup>

27. There are similar concerns about the lack of accountability expressed in declaration from inmates at Hamilton, Donaldson and Kilby Correctional Facilities. It is clear from the declarations I have reviewed that changes sufficient to protect prisoners from a serious risk of harm have not been put in place, with the possible exception of Tutwiler Correctional Facility, within the Alabama Department of Corrections prisons.

## **VII. SOLUTIONS ARE READILY AVAILABLE**

28. In the letter from the attorney for the ADOC there is a statement that part of the plan is to assemble a group to write a policy with representatives from security, mental health and health services. The letter goes on to say, "The goal of the group is to formulate a policy based (sic) the best practices with research and/or input from NIC, ASCA, and other states' correctional programs".<sup>19</sup> While I would support the need for a clearly written policy that can be effectively

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<sup>16</sup> Charlie Henderson Declaration, paragraphs 5 and 7

<sup>17</sup> Leviticus Pruitt Declaration, paragraphs 9 and 10

<sup>18</sup> Robert Williams declaration, paragraphs 9, 10 and 15

<sup>19</sup> Ltr 06-06-14 Morris razors



implemented, I am concerned about the length of time it would take a large group to do so, especially if the plan is to rely on input from NIC (National Institute of Corrections) or ASCA (Association of State Corrections Administrators). As a former corrections Secretary I have worked with both NIC and ASCA in the past (I am currently an Associate Member of ASCA). While both of these resources can provide valuable information, this is not a complex issue and solutions could come much more quickly by assembling a plan and quickly putting it in place.

29. The ADOC appears to have had some more effective practices in place in the past to account for razors. A prisoner currently in Administrative Segregation at St. Clair Correctional Facility, speaking of his prior experience at that same facility approximately two years ago says, “ At that time, all Mental Health caseload people who had a history of cutting themselves had a “card” on their cell to “clip shave” them, but now they don’t. Clip shave meant that the person was not given a razor but was shaved by staff”.<sup>20</sup> Another prisoner, this one currently housed in segregation at Holman Correctional Facility reports, “When I first came to Holman, razors that were distributed for shaving were collected after showers. Each razor had the cell number written on it. They were stored in a box that had slots for the razor for each cell”.<sup>21</sup>

30. Even now, at one of ADOC’s prisons, it appears they have proper control of razors already in place. A prisoner from Tutwiler with a history of cutting herself with razors reports that, “To get a new razor, you must turn in a razor”. She also reports, “In segregation, women prisoners are not permitted to keep razors in their cells. They are given razors when going to shower and must return them after the shower”.<sup>22</sup> This would be a good example for the ADOC to follow at all of their prisons.

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<sup>20</sup> Christopher Jackson Declaration, paragraph 8

<sup>21</sup> Leviticus Pruitt Declaration, paragraph 4

<sup>22</sup> Casey Couch Declaration, paragraphs 5 and 6

31. I have seen all of these procedures in place in other jurisdictions and they are effective in limiting the unauthorized access of razors to inmates. It is my opinion that a competent senior custody staff member could craft a solution to this on-going problem in the ADOC, and write a policy, based on his or her own experience, the current experience in the department illustrated in the paragraph above referencing the reported practice at Tutwiler and maybe a phone call or two to other jurisdictions. It is inexplicable to me that this has not been done given the serious risk of harm to prisoners that currently exist within Alabama prisons.

#### **VIII. ELEMENTS OF A SOLUTION**

32. The ADOC should craft a policy that includes the following elements:

- One-for-one accountability of razors in all segregation units, Residential Treatment Units, Stabilization Units and on suicide watch that only allows the inmate to have a razor during their authorized shower time
- Based upon direction from mental health staff, direct observation of shaving for prisoners with a history of self-harm
- A clear standard for allowable razors for general population units
- A procedure that new razors can only be issued when an inmate turns in his or her old razor
- Establishment of clear disciplinary consequences for inmates with unauthorized numbers or types of razors in their possession
- Notice to inmates of the state-wide changes to include an amnesty period for turning in to staff any unauthorized razors
- Follow-up targeted searches to make certain all inmates complied with the new policy
- Regular audits by central office authorities to see that the state wide policy is being followed at each of their prisons

33. Without such a clearly articulated and systemic change, prisoners in the ADOC will continue to face an on-going risk of serious harm.

Submitted by,

A handwritten signature in black ink, appearing to read 'E. Vail', is written over a horizontal line.

Eldon Vail  
September 3, 2014

**APPENDIX 1**

**ELDON VAIL**

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 Olympia, WA. 98501  
 360-349-3033  
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**WORK HISTORY**

Nearly 35 years working in and administering adult and juvenile institutions, and probation and parole programs, starting at the entry level and rising to Department Secretary. Served as Superintendent of 3 adult institutions, maximum to minimum security, male and female. Served as Secretary for the Washington State Department of Corrections (WADOC) from 2007 until 2011.

|                                  |                                     |           |
|----------------------------------|-------------------------------------|-----------|
| ▪ Secretary                      | WADOC                               | 2007-2011 |
| ▪ Deputy Secretary               | WADOC                               | 1999-2006 |
| ▪ Assistant Deputy Secretary     | WADOC                               | 1997-1999 |
| ▪ Assistant Director for Prisons | WADOC                               | 1994-1997 |
| ▪ Superintendent                 | McNeil Island Corrections Center    | 1992-1994 |
| ▪ Superintendent                 | WA. Corrections Center for Women    | 1989-1992 |
| ▪ Correctional Program Manager   | WA. Corrections Center              | 1988      |
| ▪ Superintendent                 | Cedar Creek Corrections Center      | 1987      |
| ▪ Correctional Program Manager   | Cedar Creek Corrections Center      | 1984-1987 |
| ▪ Juvenile Parole Officer        | Division of Juvenile Rehabilitation | 1984      |
| ▪ Correctional Unit Supervisor   | Cedar Creek Corrections Center      | 1979-1983 |
| ▪ Juvenile Institution Counselor | Division of Juvenile Rehabilitation | 1974-1979 |

**SKILLS AND ABILITIES**

- Ability to analyze complex situations, synthesize the information and find practical solutions that are acceptable to all parties.
- A history of work experience that demonstrates how a balance of strong security and robust inmate programs best improves institution and community safety.
- Leadership of a prison system with very little class action litigation based on practical knowledge that constitutional conditions are best achieved through negotiation with all parties and not through litigation.
- Extensive experience as a witness, both in deposition and at trial.
- Experience working with multiple Governors, legislators of both parties, criminal justice partners and constituent groups in the legislative and policymaking process.
- Skilled labor negotiator for over a decade. Served as chief negotiator with the Teamsters and the Washington Public Employees Association for Collective Bargaining Agreements. Chaired Labor Management meetings with Washington Federation of State Employees.
- Excellent public speaking and writing abilities.

## APPENDIX 1

### HIGHLIGHTS OF CAREER ACCOMPLISHMENTS

- Reduced violence in adult prisons in Washington by over 30% during my tenure as Secretary and Deputy Secretary even though the prison population became much more violent and high risk during this same time period.
- Achieved dramatic reduction in escapes, including from minimum-security facilities.
- Increased partnerships with non-profits, law enforcement and community members in support of agency goals and improved community safety.
- Implemented and administered an extensive array of evidence based and promising programs:
  - Education, drug and alcohol, sex offender and cognitive treatment programs.
  - Implemented risk based sentencing via legislation and policy, reducing the prison populations of non-violent, low risk offenders, including the Drug Offender Sentencing Alternative and, as the Secretary, the Family and Offender Sentencing Alternative. <http://www.doc.wa.gov/community/fosa/default.asp>
  - Pioneered extensive family based programs resulting in reductions in use of force incidents and infractions and improved reentry outcomes for program participants.
  - Established Intensive Treatment Program for mentally ill inmates with behavioral problems.
  - Established step down programs for long-term segregation inmates resulting in significant reduction in program graduate returns to segregation. <http://www.thenewstribune.com/2012/07/10/2210762/isolating-prisoners-less-common.html>
- Initiated the Sustainable Prison Project; <http://blogs.evergreen.edu/sustainableprisons/>
- Administered the only state agency that bent the curve on health care costs while improving treatment outcomes.
- Focused the department on becoming a better asset to the community by expanding inmate and community supervision work programs.
- Improved efficiency in the agency by administrative consolidation, closing 3 high cost institutions and eliminating over 1,200 positions. Housed inmates at lowest possible custody levels, also resulting in reduced operating costs
- Successful settlement of the Jane Doe class action law suit, a PREA case regarding female offenders in the state's women's' prisons.
- Avoided class action lawsuit regarding religious rights of Native Americans. [http://seattletimes.nwsourc.com/html/opinion/2015464624\\_guest30galanda.html](http://seattletimes.nwsourc.com/html/opinion/2015464624_guest30galanda.html)
- Led the nation's corrections directors to support fundamental change in the Interstate Compact as a result of the shooting of 4 police officers in Lakewood, WA.

## APPENDIX 1

- Dramatically improved media relations by being aggressively open with journalists, challenging them to learn the difficult work performed by corrections professionals on a daily basis.
- Long term collaboration with the University of Washington focusing on the mentally ill in prison and management of prisoners in and through solitary confinement.

## EDUCATION AND OTHER BACKGROUND INFORMATION

- Post graduate work in Public Administration - The Evergreen State College, Washington - 1980 and 1981
- Bachelor of Arts - The Evergreen State College, Washington – 1973
- National Institute of Corrections and Washington State Criminal Justice Training Commission - various corrections and leadership training courses
- Member of the American Correctional Association
- Associate member, Association of State Correctional Administrators (ASCA)
- Guest Speaker, Trainer and Author for the National Institute of Corrections (NIC)
- Commissioner, Washington State Criminal Justice Training Commission 2002-2006, 2008-2011
- Member, Sentencing Guidelines Commission 2007-2011
- Instructor for Correctional Leadership Development for the National Institute of Corrections
- Advisory Panel Member, *Correctional Technology—A User's Guide*
- Author of *Going Beyond Administrative Efficiency—The Budget Crisis in the State of Washington*, published in Topics of Community Corrections by NIC, 2003
- Consultant for *Correctional Leadership Competencies for the 21<sup>st</sup> Century*, an NIC publication
- Consultant for Correctional Health Care Executive Curriculum Development, an NIC training program, 2012
- Co-chair with King County Prosecutor Dan Satterberg, *Examining the Tool Box: A Review of Supervision of Dangerous Mentally Ill Offenders*  
<http://www.dbhds.virginia.gov/documents/Adm/080101-KingCountyReport.pdf>
- Guest lecturer on solitary confinement at University of Montana Law School in 2012
- Guest Editorial, Seattle Times, February 22, 2014  
[http://seattletimes.com/html/editorialsopinionpages/2022966008\\_should-death-penalty-be-abolished.html](http://seattletimes.com/html/editorialsopinionpages/2022966008_should-death-penalty-be-abolished.html)

## APPENDIX 1

### CURRENT ACTIVITIES

- Serve on the Board of Advisors for Huy, a non-profit for supporting Native American Prisoners
- Registered Agent for ASCA in Washington
- Retained as an expert witness or consultant in the following cases:
  - *Mitchell v. Cate*,  
No. 08-CV-1196 JAM EFB  
United States District Court, Eastern District of California,  
Declarations, March 4, 2013, May 15, 2013 and June 7, 2013  
Deposed on July 9, 2013
  - *Parsons, et al v. Ryan*,  
No. CV 12-06010 PHX-NVW  
United States District Court of Arizona  
Declarations, November 8, 2013, January 31, 2014,  
February 24, 2014 and June 16, 2014  
Deposed February 28, 2014
  - *Gifford v. State of Oregon*,  
No. 6:11-CV-06417-TC  
United States District Court, For the District of Oregon,  
Eugene Division,  
Expert report March 29, 2013  
Case settled, May 2013
  - *Ananachescu v. County of Clark*,  
No. 3:13-cv-05222-BHS  
United States District Court, Western District of Tacoma  
Case settled, February 2014
  - *Coleman et al v. Brown, et al*,  
No. 2:90-cv-0520 LKK JMP P  
United State District Court, Eastern District of California,  
Declarations, March 14, 2013, May 29, 2013, August 23, 2013 and  
February 11, 2014  
Deposed on March 19, 2013 and June 27, 2013  
Testified on October 1, 2, 17 and 18, 2013
  - *Peoples v. Fischer*,  
No. 1:11-cv-02694-SAS  
United States District Court, Southern District of New York  
Interim settlement agreement reached February 19, 2014,  
Negotiations ongoing

**APPENDIX 1**

- *Dockery v. Epps*,  
No. 3:13-cv-326 TSL JMR  
United States District Court for the Southern District of Mississippi,  
Jackson Division  
Report to the court, June 16, 2014
- *C.B., et al v. Walnut Grove Correctional Authority et al*,  
No. 3:10-cv-663 DPS-FKB,  
United States District Court for the Southern District of Mississippi,  
Jackson Division  
Memo to ACLU and Southern Poverty Law Center, March 14, 2014,  
filed with the court  
Report to the court August 4, 2014
- *Graves v. Arpaio*,  
No. CV-77-00479-PHX-NVW,  
United States District Court of Arizona  
Declaration, November 15, 2013  
Testified on March 5, 2014
- *Wright v. Annucci, et al*,  
No. 13-CV-0564 (MAD)(ATB)  
United States District Court, Northern District of New York  
Report to the court, April 19, 2014
- *Corbett v. Branker*,  
No. 5:13 CT-3201-BO  
United States District Court, Eastern District of North Carolina,  
Western District  
Special Master appointment November 18, 2013  
Expert Report to the court January 14, 2014  
Testified March 21, 2014
- *Fontano v. Godinez*,  
No. 3:12-cv-3042  
United States District Court, Central District of Illinois,  
Springfield Division  
Report for the court, August 16, 2014
- *Atencio v. Arpaio*,  
No. CV12-02376-PHX-PGR  
United States District Court of Arizona  
Report to the court February 14, 2014  
Deposed on July 30, 2014
- *State of Oregon v. James DeFrank*  
Case # 11094090C  
Malheur County, Oregon



**APPENDIX 1**

- *Disability Rights, Montana, Inc. v. Richard Opper*,  
No. CV-14-25-BU-SHE  
United State District Court for the District of Montana,  
Butte Division
- *Larry Heggem v. Snohomish County*,  
No. CV-01333-RSM  
United States District Court, Western District of Washington at Seattle  
Report to the court May 29, 2014  
Deposed June 27, 2014
- *Padilla v. Beard, et al*  
Case 2:14-at-00575  
United States District Court, Eastern District of California,  
Sacramento Division
- *Dunn et al v. Thomas et al*  
No. 2:14-cv-00601-WKW-TFM  
United States District Court, Middle District of Alabama
- *Sassman v. Brown*  
No. 2:14-cv-01679-MCE-KJN  
United States District Court, Eastern District of California,  
Sacramento Division  
Declaration, August 27, 2014

**SAMPLE REFERENCES:** contact information available upon request:

Chris Gregoire, former Governor, State of Washington  
Tom McBride, Executive Secretary, Washington Association of Prosecuting Attorneys  
Chase Riveland, Riveland Associates  
Rowland Thompson, Executive Director, Allied Daily Newspapers

**APPENDIX 2**

1. ADOC Administrative Regulation 630, Mental Health Watch Procedures
2. ADOC Administrative Regulation 629, Inmate Suicide Prevention Program
3. ADOC Administrative Regulation 338, Inmate Property
4. Class Action Complaint for Declaratory and Injunctive Relief
5. Ltr 06-06-14 Morris razors
6. Incident Report-1-21-14
7. Inmate Declarations:
  - William Villar
  - Jermaine Mitchell
  - Zerrick Naylor
  - Augustus Smith
  - Chandler Clements
  - Charlie Henderson
  - Christopher Jackson
  - Daletrick Hardy
  - Howard Carter
  - Joshua Dunn
  - Larry Lay
  - Leviticus Pruitt
  - Marty George
  - Maxwell Gray
  - Rick Martin
  - Roger Moseley
  - Timothy Sears
  - Walter Bennett
  - Willie McClendon
  - Casey Couch
  - Daniel Tooley
  - John Maner
  - Jonathon Sanford
  - Richard Businelle
  - Richard Terrell
  - Robert Dillard
  - Robert Williams
  - Dwight Hagood
  - Joseph Torres
  - Julius Bowe
  - Tedrick Brooks
  - Turner Rogers