

Pro Se 14 (Rev. 09/16) Complaint for Violation of Civil Rights (Prisoner)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMADarryl Foster

Plaintiff

(Write your full name. No more than one plaintiff may be named in a complaint.)

-v-

2:17-cv-02001-CLS-JHE

SEE ATTACHED

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all of the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here. Your complaint may be brought in this court only if one or more of the named defendants is located within this district.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS
(Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee of \$400.00 or an Application to Proceed *In Forma Pauperis*.

Mail the original complaint and the filing fee of \$400.00 or an Application to Proceed *In Forma Pauperis* to the Clerk of the United States District Court for the Northern District of Alabama, Room 140, Hugo L. Black U.S. Courthouse, 1729 5th Avenue North, Birmingham, Alabama 35203-2195.

ATTACHMENT TO PAGE 1

DEFENDANTS

LT. JENKINS
OFFICER YOUNG
OFFICER EDDIE WATTS
OFFICER GASTON
OFFICER HAYWOOD
OFFICER PARKS
LT. SHEPARD
ANGELA MIREE
MRS. BONNER
SERGEANT AaRON
OFFICER SNELSON

I. The Parties to this Complaint**A. The Plaintiff**

Provide the information below for the plaintiff named in the complaint.

Name

Danny Foster

All other names by which you have been known:

ID Number

167693

Current Institution

W.E. Donaldson Correctional Facility

Address

100 Womack LaneBessemer Alabama 35023

City

State

Zip Code

B. The Defendant(s)Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. Make sure that the defendant(s) listed below are identical to those contained in the above caption. For an individual defendant, include the person's job or title (*if known*) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name

K. JenkinsJob or Title (*if known*)Correctional Lieutenant

Shield Number

Employer

W.E. Donaldson Correctional Facility

Address

100 Womack LaneBessemer Alabama 35023

City

State

Zip Code

 Individual Capacity Official Capacity

Defendant No. 2

Name

Officer YoungJob or Title (*if known*)Correctional Officer

Shield Number

Employer

W.E. Donaldson Correctional Facility

Address

100 Womack LaneBessemer Alabama 35023

City

State

Zip Code

 Individual Capacity Official Capacity

ATTACHMENT TO PAGE 2 (CON)

DEFENDANT NO. 10

NAME
JOB OR TITLE (IF KNOWN)
SHIELD NO.
EMPLOYER
ADDRESS

SERGEANT AaRON
CORRECTIONAL SERGEANT
W.E. DONALDSON CORRECTIONAL FACILITY
100 WARRIORLANE
BESSEMER, ALABAMA 35023

DEFENDANT NO. 11

NAME
JOB OR TITLE (IF KNOWN)
SHIELD NO.
EMPLOYER
ADDRESS

OFFICER SNELSON
CORRECTIONAL OFFICER
W.E DONALDSON CORRECTIONAL FACILITY
100 WARRIOR LANE
BESSEMER, ALABAMA 35023

EACH DEFENDANT IS SUED IN THEIR PERSONAL CAPACITY *8 official capacity*

Defendant No. 3

Name Eddie Woods
 Job or Title (if known) Contract Officer
 Shield Number
 Employer D.E. Donaldson Contract Facility
 Address 100 Linton Lane
Bessemer City Alabama State 35023 Zip Code
 Individual Capacity Official Capacity

Defendant No. 4

Name Office Caster
 Job or Title (if known) Contract Officer
 Shield Number
 Employer D.E. Donaldson Contract Facility
 Address 100 Linton Lane
Bessemer City Alabama State 35023 Zip Code
 Individual Capacity Official Capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal law]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

Federal officials (a *Bivens* claim)
 State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities, secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

(Civil Rights Act)

C. Plaintiffs suing under *Bivens* may only recover for violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

AMH

D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

See Plaintiff's Civil Complaint Attached

III. Prisoner Status

Indicate whether you are a prisoner or other confined person as follows (*check all that apply*):

- Pretrial Detainee
- Civilly committed detainee
- Immigration detainee
- Convicted and sentenced state prisoner
- Convicted and sentenced federal prisoner
- Other _____
(explain)

IV. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. If the events giving rise to your claim arose outside an institution, describe where and when they arose.

AMH

B. If the events giving rise to your claim arose in an institution, describe where and when they arose.

See Plaintiff's Civil Complaint Attached

C. What date and approximate time did the events giving rise to your claim(s) occur?

See Plaintiff's Civil Complaint Attached

D. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

See Plaintiff's Civil Complaint Attached

V. Injuries

If you sustained injuries related to the events alleged above, describe your injuries in detail.

See Plaintiff's Civil Complaint Attached

VI. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

See Plaintiff's Civil Complaint Attached

VII. Exhaustion of Administrative Remedies Administrative Procedures

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted."

Administrative remedies are also known as grievance procedures. Your case may be dismissed if you have not exhausted your administrative remedies.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

Yes

No

If yes, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

W.E. Donohue Correctional Facility

B. Does the jail, prison, or other correctional facility where your claim(s) arose have a grievance procedure?

Yes

No

Do not know

C. Does the grievance procedure at the jail, prison, or other correctional facility where your claim(s) arose cover some or all of your claims?

Yes

No

Do not know

If yes, which claim(s)?

DMA

D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose concerning the facts relating to this complaint?

Yes

No

If no, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

Yes

No

E. If you did file a grievance:

1. Where did you file the grievance?

MPA

2. What did you claim in your grievance?

MPA

3. What was the result, if any?

MPA

4. What steps, if any, did you take to appeal that decision? Is the grievance process completed? If not, explain why not. (Describe all efforts to appeal to the highest level of the grievance process.)

There is no grievance process in this place

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here:

Please see grievance process in this document

2. If you did not file a grievance but you did inform officials of your claim, state who you informed, when and how, and their response, if any:

I informed Warden Max Brown II of this situation on my appeal in May. I do not know if he would not investigate the matter

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.

JMM

(Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.)

VIII. Previous Lawsuits

The "three strikes rule" bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has "on three or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. § 1915(g).

To the best of your knowledge, have you had any cases dismissed based on grounds that it was frivolous, malicious, or failed to state a claim upon which relief may be granted?

Yes
 No

If yes, state which court dismissed your case(s), when this occurred, and attach a copy of the order(s) if possible.

JMM

A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

Yes

No

B. If your answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff(s) _____ *MA*

Defendant(s) _____ *MA*

2. Court (if federal court, name the district; if state court, name the county and State)

3. Docket or index number

_____ *MA*

4. Name of Judge assigned to your case

_____ *MA*

5. Approximate date of filing lawsuit

_____ *MA*

6. Is the case still pending?

Yes

No

MA

If no, give the approximate date of disposition. _____ *MA*

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

_____ *MA*

IX. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Printed Name of Plaintiff

Danney Foster

Prison Identification #

167093

Prison Address

100 Marion Lane

Bessemer

City

Alabama

State

350623

Zip Code

I declare under penalty of perjury that the foregoing is true and correct.

Executed on

11-29-17

(Date)

X I, Danney Foster
Signature of Plaintiff

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

DANNY FOSTER	(
PLAINTIFF	(
VS	(
	(<u>CASE NO:</u> _____
LT JENKINS	(
OFFICER YOUNG	(
OFFICER EDDIE WATTS	(
OFFICER GASTON	(
OFFICER HAYWOOD	(
OFFICER PARKS	(
LT SHEPARD	(
ANGELA MIREE	(
WARDEN 2	(
MRS BONNER	(
CLASSIFICATION SUPERVISOR	(
SERGEANT AaRON	(
OFFICER SNELSON	(

PLAINTIFF'S CIVIL COMPLAINT

COMES NOW THE ABOVE STYLED PLAINTIFF DANNY FOSTER AND FILES
THIS HIS 42 USC 1983 CIVIL COMPLAINT AND IN SUPPORT OF SAME
THIS PLAINTIFF WILL SHOW UNTO THIS HONORABLE COURT THE FOLLOWING

1. STATEMENT OF THE FACTS

ON DECEMBER 6, 2015 AT APPROXIMATELY (9:30AM) LT JENKINS SENT
FOR DANNY FOSTER WHO AT THAT TIME WAS HOUSED IN (A-38) THE
INSTITUTIONAL (CRIME BILL PROGRAM). DANNY FOSTER WAS THEN
ESCORTED BY OFFICER YOUNG TO THE WEST CLASSIFICATION UNIT AREA
UPON ARRIVAL TO THE WEST CLASSIFICATION AREA DANNY FOSTER THEN
ENTERED THE WEST CLASSIFICATION AREA WHERE HE WAS CONFRONTED BY
LT JENKINS.

OFFICER YOUNG, AND OFFICER EDDIE WATTS AND LT JENKINS WERE
PRESENT, LT JENKINS TOLD DANNY FOSTER TO COME AND HAVE A SEAT
WE'RE GOING TO BEAT YOUR ASS

LT JENKINS LOOKED AT OFFICER EDDIE WATTS AND TOLD OFFICER EDDIE WATTS TO GO GET OFFICER GASTON WHEN OFFICER GASTON ARRIVED AT THE WEST CLASSIFICATION AREA, LT JENKINS TOLD OFFICER GASTON WERE GOING TO BEAT HIS ASS OFFICER GASTON TOLD LT JENKINS OK, OFFICER GASTON WENT AND STOOD IN THE WEST CLASSIFICATION AREA DOORWAY WITH LT JENKINS, ONE OF THE INMATES WHO HAD ROBBED DANNY FOSTER PREVIOUSLY WAS ALREADY IN THE WEST CLASSIFICATION AREA. SITTING WITH LT JENKINS, WHEN DANNY FOSTER ARRIVED AT THE WEST CLASSIFICATION AREA., OFFICER HAYWOOD WAS ALSO ALREADY IN THE WEST CLASSIFICATION AREA, LT JENKINS TOLD OFFICER HAYWOOD TO GET OUT OF THE WEST CLASSIFICATION AREA WERE GOING TO BEAT HIS ASS THAT HE DIDN'T NEED NO WITNESSES, OFFICER HAYWOOD TOLD LT JENKINS OKAY, OKAY I'M GOING

LT JENKINS YELLED AT OFFICER HAYWOOD AND TOLD HER TO HURRY UP AND GET OUT OF HERE.

OFFICER EDDIE WATTS TOLDDANNY FOSTER TOCOME HERE AND LET ME TALK TOYOU, DANNY FOSTER GOT UP TO TALK WITH OFFICER EDDIE WATTS AS DANNY FOSTER GOT READY TO GO WHERE OFFICER EDDIE WATTS WAS SO THAT OFFICER EDDIE WATTS COULD TALK TO DANNY FOSTER,LT JENKINS GOT UP WITH THE MAZE IN HIS HAND, LT JENKINS TOLD DANNY FOSTER TO SIT HIS BLACK ASS DOWN, OFFICETR EDDIE WATTS TOLD LT JENKINS THAT HE KNEW DANNY FOSTER, THAT HE COULD TALK TO HIM DANNY FOSTER SAT BACK DOWN, DANNY FOSTER HAD A SKULL CAP IN HIS HAND LT JENKIN SNATCHED DANNY FOSTER'S SKULL CAP OUT OF HIS HANDS LT JENKINS POURED HIS COFFEE CUP OF TEA ON THE TABLE IN WEST CLASSIFICATION ARE, WHILE OFFICER YOUNG WAS DOUBLE LOCKING HIS HANDCUFFS THAT HE HAD IN HIS HAND,LT JENKINS KEPT DIPPING DANNY FOSTER'S SKULL CAP IN THE TEA THAT HE HAD POURED ON THE TABLE IN THE WEST CLASSIFICATION AREA. AND KEPT SAYING THAT DANNY FOSTER

PLAYED HIM LIKE A LITTLE BITCH, LT JENKINS SAID NOW HE WAS GOING TO PLAY DANNY FOSTER LIKE A LITTLE BITCH, DANNY FOSTER ASKED LT JENKINS WHY WAS HE DOING THIS, LT JENKINS TOLD DANNY FOSTER THAT A INMATE TOLD HIM THAT DANNY FOSTER OWED HIM ON A TICKET THAT HE HAD HIT AND THAT DANNY FOSTER DIDN'T PAY THE INMATE AND THAT THE INMATE WENT IN DANNY FOSTER'S LOCKER BOX AND TOOK THE MONEY THAT DANNY FOSTER OWED THE INMATE DANNY FOSTER LOOKED AT THE INMATE WHO WAS ALREADY IN THE WEST CLASSIFICATION AREA, AND STATED TO THE INMATE IF YOUR GOING TO TELL SOMETHING TELL THE TRUTH, YOU KNOW THAT I DON'T GAMBLE, I DON'T DRINK, I DON'T MESS WITH BOYS OR GET INTO ANY OF THIS PRISON JUNCK, DANNY FOSTER TOLD THE INMATE THAT HE AND TWO OTHER INMATES ROBBED HIM.

DANNY FOSTER TOLD THE INMATE THAT HE AND THE OTHER TWO INMATES TOOK HIS C&/(PHONE AND CHARGER AT KNIFE POINT, DANNY FOSTER TOLD THE INMATE THAT HE WAS THE VICTIM THAT DANNY FOSTER IS THE ONE THAT SHOULD BE UP HERE TELLING WHAT HAPPENED, BUT HE'S NOT, DANNY FOSTER TOLD THE INMATE THAT HE WAS UP HERE LIKE A SCARED LITTLE BITCH, TELLING LIES, THE INMATE TOLD LT JENKINS THAT HE WAS MENTAL HEALTH AND THAT HE'S NOT SCARED OF ANYBODY, DANNY FOSTER TOLD THE INMATE THAT HE MUST BE, YOUMOTHERFUCKER THE INMATE SAID TO DANNY FOSTER WHO YOU CALLING A MOTHERFUCKER DANNY FOSTER TOLD THE INMATE YOU, YOU SON OF A BITCH, AT THAT TIME DANNY FOSTER JUMPED UP ACROSS THE TABLE WHERE THE INMATE WAS SITTING

OFFICER EDDIE WATTS PINNED DANNY FOSTER TO THE TABLE IN WEST CLASSIFICATION AREA OFFICER EDDIE WATTS TOLD DANNY FOSTER DON'T MOVE DANNY FOSTER STAY DOWN. DANNY FOSTER LOOKED TO HIS RIGHT AT THAT POINT OFFICER YOUNG HIT DANNY FOSTER RIGHT ABOVE HIS ~~RIGHT~~ EYE WITH A SET OF HANDCUFFS HE HAD IN HIS HAND DANNY FOSTER CLOSED HIS RIGHT EYE BECAUSE OF THE FORCE OF THE BLOW AT THAT POINT DANNY FOSTER LOOKED TO HIS LEFT AT THAT POINT DANNY FOSTER OPENED HIS EYES DANNY FOSTER OBSURBED OFFICER GASTON APPROACH HIM WITH HIS BATON IN HIS HAND

OFFICER GASTON HIT DANNY FOSTER ACROSS HIS NOISE WITH HIS B ATON DANNY FOSTER CLOSED HIS EYES AGAIN IN AN ATTEMPT TO GAIN HIS SENCES, AT THAT POINT DANNY FOSTER OPENED HIS EYES AGAIN AND OFFICER YOUNG HIT DANNY FOSTER IN HIS MOUTH WITH HIS HANDCUFFS AT THAT POINT DANNY FOSTER LOOKED STRAIGHT AHEAD AND WENT TO DUCKING TRYING TO GET AWAY FROM THE BLOWS BEING DELIEVERED TOHIM BY OFFICER YOUNG AND OFFICER GASTON, LT JENKINS ACCIDENTLY PEPPER SPRAYED OFFICER EDDIE WATTS, BECAUSE LT JENKINS WAS PEPPER SPRAYING DANNY FOSTER, WHILE OFFICER EDDIE WATTS HAD DANNY FOSTER DOWN ON THE TABLE SPREAD OUT TRYING TO CONTAIN DANNY FASTER AT THAT POINT OFFICER GASTON STABBED DANNY FOSTER IN HIS LEFT SIDE WITH HIS BATON AT THAT POINT DANNY FOSTER FELL TO THE FLOOR IN THE WESTCLASSIFICATION AREA, AT THAT TIME OFFICER PARKS HAD COME INSIDE OF THE WEST CLASSIFICATION AREA.

WHEN OFFICER PARKS ARRIVED IN WEST CLASSIFICATION ARE, OFFICER PARKS PUT THE HANDCUFFS ON DANNY FOSTER FROM BEHIND AT THAT POINT LT JENKINS YELLED OUT, ~~C~~ HE GOT A KNIFE IN HIS WAIST BAND, SOMEBODY GET THE KNIFE, AT THAT POINT OFFICER YOUNG AND OFFICER GASTON PICKED DANNY FOSTER UP OFF THE FLOOR, AT THAT POINT LT JENKINS PULLED DANNY FOSTER'S SHIRT UP OVER HIS HEAD, AND STARTED WALKING DANNY FOSTER TO THE INFIRMERY, AT THAT POINT LT JENKINS SLAMMED DANNY FOSTER'S FACE UP AGAINST THE WALL ON THE WAY TO THE IN FIRMERY, ONCE DANNY FOSTERT ARRIVED IN THE INFIRMERY, MEDICAL PERSONEL DID A BODY CHART ON DANNY FOSTER ONE OF THE NURSES TOLD LT JENKINS THAT DANNY FOSTER HAD TO BE TRANSPORTED TO BROOKWOOD MEDICAL CENTER BECAUSE HIS WOUNDS WERE SERIOUS, AT THAT POINT OFFICER PARKS AND ANOTHER OFFICER TRANSPORTED DANNY FOSTER TO BROOKWOOD MEDICAL CENTER, WHEN DANNY FOSTER ARRIVED AT BROOKWOOD MEDICAL CENTER A EMERGENCY ROOM

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DOCTOR EXAMINED DANNY FOSTER AND ORDERED X RAYS BE MADE OF DANNY
FOSTER'S INJURY'S WHEN THE X RAYS WERE COMPLETED THE EMERGENCY
ROOM DOCTOR TOLD DANNY FOSTER THAT HE HAD A BROKEN NOISE, A
CRACKED LEFT RIBB, AND THAT HE HAD TO STICH UP ABOVE HIS RIGHT
EYE, AND ALSO HAD TO STITCH UP DANNY FOSTER'S LIP. THE EMERGENCY
ROOM DOCTOR TOLD DANNY FOSTER THAT THERE WAS NOTHING HE COULD
DO ABOUT HIS BROKEN NOISE, OR CRACKED LEFT RIBB ON HIS LEFT SIDE
THEY WOULD HAVE ~~TO~~ HEEL BY THEMSELVES, DANNY FOSTER WAITED
AFTER A WHILE, THE EMERGENCY ROOM DOCTOR CAME TO STICH HIM UP
DANNY FOSTER HAD HIS EYE RIGHT ABOVE HIS EYE STICHED UP DANNY
FOSTER LIP WAS ALSO STICHED UP

AFTER THAT OFFICER PARKS AND THE OTHER OFFICER RETURNED DANNY
FOSTER BACK TO WILLIAM E. DONALDSON CORRECTIONAL FACILITY AND
TOOK DANNY FOSTER TO THE INFIRMERY AND THE INFIRMERY DID ANOTHER
BODY CHART LT JENKINS WROTE DANNY FOSTER A DISCIPLINARY
REPORT LT JENKINS BROUGHT DANNY FOSTER THE DISCIPLINARY
REPORT AND ASKED DANNY FOSTER DID HE WANT TO SIGN IT, DANNY FOSTER
SAID YES AND SIGNED IT, AND SAID HE WANTS TO PUT DOWN SOME
WITNESSES AND THAT HE WANTED TO WRITE A STATEMENT, AFTER DANNY
FOSTER ACCOMPLISHED THIS OFFICER PARKS TOOK DANNY FOSTER
TO SEGREGATION LOCK-UP AND PUT DANNY FOSTER IN V- DANNY FOSTER
WAS IN V-9 FOR ONE MONTH WAITING TO GO TO DISCIPLINARY COURT
THEN AFTER TWO(2) MONTHS THEY CAME AND TOOK DANNY FOSTER TO
DISCIPLINARY COURT THEY TOOK DANNY FOSTER TO DISCIPLINARY COURT
IN THE V & W BLOCK CORRIDOR THE HEARING OFFICER TOLD DANNY
FOSTER HOW HE PLEAD DANNY FOSTER TOLD THE HEARING OFFICER NOT
GUILTY THE HEARING OFFICER ASKED DANNY FOSTER WHY WAS HE PLEADING
NOT GUILTY, DANNY FOSTER TOLD THE HEARING OFFICER THAT HE
DIDN'T TRY TO STAB THE INMATE THAT'S WHY HE'S PLEADING NOT
GUILTY AND BESIDES THAT, DANNY FOSTER TOLD THE HEARING OFFICER
THAT HE HAD TO BE SERVED THIS DISCIPLINARY REPORT WITHIN TEN (10)

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DAYS, SO I'M NOT GUILTY BECAUSE OF THE DUE PROCESS. THE
HEARING OFFICER SAID THAT HE WAS NOT GOING TO REINSTATE THE
DISCIPLINARY REPORT, AND THE HEARING OFFICER FOUND DANNY FOSTER
NOT GUILTY, BECAUSE OF A DUE PROCESS VIOLATION, THE HEARING
OFFICER TOLD DANNY FOSTER THAT HE WOULD BE SERVED THE FINAL
COPY OF THE DISCIPLINARY REPORT ONCE THE WARDEN SIGNS OFF ON IT
DANNY FOSTER WAS TAKEN BACK TO V-9 THAT WENDSDAY DANNY FOSTER
WENT TO SEE THE SEG BOARD, AND TRIED TO EXPLAIN TO WARDEN MIREE
WHAT HAD HAPPENED AND WARDEN MIREE CUT DANNY FOSTER OFF, AND
SAID THAT DANNY FOSTER WAS THE AGGRESSER, DANNY FOSTER TOLD
WARDEN MIREE THAT HE WASN'T THE AGGRESSER, WARDEN MIREE TOLD
DANNY FOSTER TO GO OUT THERE AND GIVE HER THREE (3) MORE MONTHS
AND ~~GOING~~ GOING TO MAKE YOU ANY PROMISES, DANNY FOSTER TOLD
WARDEN MIREE OK, YOU HAVE A GOOD DAY, WHEN THEY GAVE DANNY FOSTER
HIS ONE (1) CALL PER MONTH DANNY FOSTER CALLED HIS WIFE AND TOLD
HIS WIFE TO CALL I & I AND TELL THEM THAT DANNY FOSTER
HAD BEEN JUMPED ON BY SEVERAL OFFICERS, DANNY FOSTER'S WIFE
CALLED I & I AND SPOKE TOA LT. SHEPARD, LT SHEPARD TOLD DANNY
FOSTER'S WIFE THAT SHE WOULD BE COMIMG TO W.E. DONALDSON
CORRECTIONAL FACILITY TOSPEACK WITH DANNY FOSTER, LT SHEPARD
CAME TO SEE DANNY FOSTER IN 2016 LT SHEPARD CAME TO SEE DANNY
FOSTER, WHEN SHE ARRIVED, SHE INTRODUCED HERSELF TO DANNY FOSTER
LT SHEPARD TOLD DANNY FOSTER THAT SHE HAD RECEIVED A PHONE
CALL FROM DANNY FOSTER'S WIFE, AND DANNY FOSTER'S WIFE TOLD HER
THAT DANNY FOSTER HAD TOLD HIS WIFE TOTELL I & I THAT OFFICERS
HAD JUMPED ON HIM.

LT SHEPARD TOLD DANNY FOSTER THAT SHE WAS GOING TO INTERVIEW
DANNY FOSTER, AND TAKE A VIDEO RECORDED STATEMENT, THEN LT.
SHEPARD GOT HER CELLPHONE AND SAT ITUP ON THE TABLE, AND THEN
LT. SHEPARD STARTED RECORDING THE INTERVIEW, LT SHEPARD THEN TOLD
DANNY FOSTER TOTELLHER WHAT HAPPENED, DANNY FOSTER STARTED

TELLING LT SHEPARD WHAT HAPPENED, AFTER DANNY FOSTER EXPLAINED TO LT SHEPARD WHAT HAD HAPPENED, DANNY FOSTER TOLD LT SHEPARD THAT HE FEARED FOR HIS LIFE, LT. SHEPARD TOLD DANNY FOSTER THAT SHE WAS GOING TO GO DOWNTOWN TO MONTGOMERY, AND SHOW THE VIDEO INTERVIEW TO HER BOSS, AND THAT LT SHEPARD WOULD BE TRANSFERRING DANNY FOSTER TO HOLMAN PRISON, AFTER THE VIDEO INTERVIEW HAD BEEN COMPLETED DANNY FOSTER WAS TAKEN BACK TO SEGREGATION TO V-9 DANNY FOSTER THEN CALLED HIS WIFE AND TOLD HER THAT I & I HAD COME AND CONDUCTED A VIDEO INTERVIEW OF DANNY FOSTER, AND DANNY FOSTER TOLD HIS WIFE TO CALL I & I AGAIN, AND ASK THEM TO DO A FOLLOW UP ON THE INCIDENT, DANNY FOSTER'S WIFE SAID OK. AND DANNY FOSTER'S WIFE TOLD DANNY FOSTER TO CALL HER BACK IN A FEW MINUTES, DANNY FOSTER CALLED HIS WIFE BACK DANNY FOSTER'S WIFE TOLD DANNY FOSTER THAT SHE HAD SPOKE WITH LT SHEPARD AND THAT LT SHEPARD TOLD HER THAT SHE WOULD BE MOVING DANNY FOSTER TO HOLMAN PRISON WITHIN A FEW DAYS DANNY FOSTER HUNG UP THE PHONE AND WENT BACK TO HIS CELL V-9

DANNY FOSTER WAITED FOR ONE (1) WEEK, AFTER THAT DANNY FOSTER CALLED HIS WIFE, AND TOLD HER TO CALL LT SHEPARD AT I & I AGAIN, THAT DANNY FOSTER WAS STILL AT WILLIAM E. DONALDSON CORRECTIONAL FACILITY, AND TO FIND OUT WHY DANNY FOSTER WAS STILL AT WILLIAM E. DONALDSON CORRECTIONAL FACILITY, DANNY FOSTER'S WIFE SAID OK, TO CALL HER BACK IN A FEW MINUTES, DANNY FOSTER CALLED HIS WIFE BACK AND DANNY FOSTER'S WIFE SAID THAT LT SHEPARD WASN'T IN HER OFFICE DANNY FOSTER TOLD HIS WIFE TO CALL LT SHEPARD'S OFFICE ALL DAY UNTIL SHE WAS ABLE TO GET HER, DANNY FOSTER'S WIFE SAID OK.

DANNY FOSTER TOLD HIS WIFE THAT HE WOULD PERIODICALLY KEEP CALLING LT SHEPARD BACK, DANNY FOSTER'S WIFE SAID OK, DANNY FOSTER HUNG UP THE PHONE.

DANNY FOSTER WENT BACK TO HIS CELL V-9, AFTER A FEW HOURS DANNY FOSTER CALLED HIS WIFE BACK TO SEE IF HIS WIFE HAD BEEN ABLE TO

GET IN TOUCH WITH LT SHEPARD, DANNY FOSTER'S WIFE TOLD DANNY FOSTER, NO, THAT SHE HAD NOT BEEN ABLE TO GET IN TOUCH WITH LT. SHEPARD, DANNY FOSTER TOLD HIS WIFE TOKEEP CALLING LT SHEPARD AND THAT HE WOULD CALL HER BACK,THIS WENT ON FOR SEVERAL MONTH S UNTIL DANNHY FOSTER AND HIS WIFE JUST STOPPED CALLING LT SHEPARD. DANNY FOSTER WENT BACK TOTHE SEG BOARD, AND SPOKE WITH WARDEN MIREE, WARDEN MIREE ASKED DANNY FOSTER WHY HE WAS OUT THERE TOSEE THE SEG BOARD, DANNY FOSTER TOLD WARDEN MIREE THA THAT HE CAME OUT TOCHECK CHECK ON HIS STATUS,AND THAT HE HAD DONE NOTHING TO BE IN SEG, AND WHEN WOULD HE B E GETTING OUT OF LOCK-UP, THAT HE HADN'T DONE ANYTHING TO BE BACK THERE IN SEG. ANYWAY.

DANNY FOSTER TOLD WARDEN MIREE THAT THE OFFICERS HAD JUMPED ON HIM AND SENT HIM OUT THE BACK GATE, AND SENT HIM TO THE FREE WORLD HOSPITAL,WARDEN MIREE TOLD DANNY FOSTER THAT HE HAD A DISCIPLINARY FOR TRYING TO STAB ANOTHER INMATE IN WEST CLASSIFICATION, DANNY FOSTER TOLDWARDEN MIREE THAT YES, HE DID GET A DISCIPLINARY REPORT, BUT HE NEVER TRIED TO STAB ANYONE, WARDEN MIREE TOLD DANNY FOSTER YOUDAD A KNIFE,DANNY FOSTER TOLD WARDEN MIREE YES MAM I DID HAVE A KNIFE,AFTER OFFICERS JUMPED ON ME, I WAS ON THE FLOOR, LT JENKINS SAW THE KNIFE IN MY WAIST AND INSTRUCTED THE OFFICERS TO GET THE KNIFE OUT OF MY WAIST AND THE KNIFE WAS NEVER IN MY HANDS, WARDEN MIREE SAID, THATS NOT WHAT THE INCIDENT REPORT AND THE DISCIPLINARY REPORT SAID, WAREN MIREE TOLD DANNY FOSTER TOGO ON BACK OUT THERE COME BACK IN A FEW MONTHS,AT THAT TIME DANNY FOSTER HAD BEEN BACK IN SEG FOR ABOUT SIX (6)MONTHSDANNY FOSTER TOLDWARDEN MIREE OK, I WANT T 'TOMAKE YOU AWARE AND THE SEG BOARD THAT I FEAR FOR MY LIFE, GET ME AWAY FORM THIS PRISON, THEN THE CLASSIFICATION SUPERVISOR MRS.BONNER STATED TODANNY FOSTER WHAT ARE YOU DOING AT THIS PRISON IN THE FIRST PLACE, DANNY FOSTER TOLD MRS BONNER I DON'T KNOW, THEY SENT ME HERE FROM KILBY CORRECTIONAL FACILITY.

MRS. BONNER THEN SAID, YOUSHOULDN'T EVEN BE HERE AT WILLIAM E. DONALDSON CORRECTIONAL FACILITY,

DANNY FOSTER TOLD MRS. BONNER, WELL I'M HERE.

DANNY FOSTER STOOD THERE FOR A FEW MINUTES, AND NO ONE SAID ANYTHING ELSE, DANNY FOSTER THEN SAID MAY I GO NOW, WARDEN MIREE SAID YES, YOU MAY GO NOW. DANNY FOSTER WENT BACK TO HIS CELL V-9 AFTER DANNY FOSTER WAS IN SEG FOR ONE (1) YEAR, DANNY FOSTER WENT BACK TO THE SEG BOARD AND ASKED WARDEN MIREE WHAT WAS SHE PLANNING ON DOING WITH THESE OFFICERS WHO JUMPED ON ME, OR HAS SHE EVEN INVESTIGATED THE MATTER, WARDEN MIREE SAID NO, SHE HAD NOT INVESTIGATED THE MATTER AND THAT SHE WASN'T PLANNING ON INVESTIGATING THE MATTER. DANNY FOSTER ASKED WARDEN MIREE WAS SHE PLANNING ON TRANSFERRING HIM TO ANOTHER PRISON, MRS. BONNER INTERRUPTED THE CONVERSATION AND SAID NO, THEY WERE NOT GOING TO TRANSFER DANNY FOSTER, DANNY FOSTER SAID, THAT'S NOT RIGHT, IT'S NO DIFFERENCE THAN ME JUMPING ON A OFFICER, YOU WOULD C-51 ME THEN, SO SINCE THEY JUMPED ON ME, AND I TOLD YOU ALL, THAT I FEAR FOR MY LIFE AND ON TOP OF THAT, I UNDERSTAND I'M A INMATE AND YOU ALL ARE GOING TO COVER THINGS UP, NOW MAY I GO, WARDEN MIREE SAID YES YOU MAY GO NOW, DANNY FOSTER WENT BACK TO HIS CELL V-9 DANNY FOSTER DID NOT GO BACK TO THE SEG BOARD ANYMORE. DANNY FOSTER CALLED HIS WIFE AND TOLD HER TO CALL LT. SHEPARD AND SEE IF SHE CAN TALK TO HER, DANNY FOSTER'S WIFE SAID OK. DANNY FOSTER TOLD HIS WIFE THAT HE WOULD CALL HER BACK IN A FEW MINUTES DANNY FOSTER WAITED A FEW MINUTES THEN CALLED HIS WIFE BACK DANNY FOSTER'S WIFE TOLD DANNY FOSTER THAT, LT. SHEPARD'S OFFICE TOLD HER THAT LT. SHEPARD WAS NOT IN DANNY FOSTER TOLD HIS WIFE OK. DANNY FOSTER TOLD HIS WIFE THAT HE WAS GOING TO WRITE THE DIRECTOR OF CLASSIFICATION IN MONTGOMERY AND TELL HER WHAT HAD HAPPENED AND TO SEE WHAT SHE COULD DO ABOUT THEM JUMPING ON HIM, DANNY FOSTER'S WIFE SAID OK, DANNY FOSTER TOLD HIS WIFE THAT HE WOULD CALL HER BACK

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TOMMORROW, DANNY FOSTER HUNG UP THE PHONE AND WENT BACK TO HIS
CELL V-9, DANNY FOSTER WROTE THE LETTER TO THE DIRECTOR OF
CLASSIFICATION IN MONTGOMERY AND MAILED IT OUT. DANNY FOSTER
CALLED HIS WIFE, AND TOLD HER THAT HE HAD WROTE THE DIRECTOR OF
CLASSIFICATION IN MONTGOMERY, DANNY FOSTER TOLD HIS WIFE TO GIVE
IT A FEW DAYS, AND CALL DOWN THERE TO THE DIRECTOR OF CLASSIFICATION
OFFICE IN MONTGOMERY AND SEE IF THE DIRECTOR OF CLASSIFICATION
HAD RECEIVED HIS LETTER, DANNY FOSTER'S WIFE SAID OK, DANNY
FOSTER HUNG UP THE PHONE AND WENT TO HIS CELL V-9 AFTER A FEW
DAYS DANNY FOSTER CALLED HIS WIFE BACK, DURING THAT TIME DANNY
FOSTER WAS MOVED ACROSS THE HALL TO SEG W-24 WITH ANOTHER INMATE
DANNY FOSTER REJECTED TO MOVE IN THE CELL WITH ANOTHER INMATE
CELL W-24 BECAUSE DANNY FOSTER WAS SUPPOSE TO BE IN A CELL BY
HIMSELF WHILE IN SEGREGATION.

SERGEANT AaRON THREATNED TO JUMP ON DANNY FOSTER IF DANNY
FOSTER DIDN'T GO IN CELL W-24 WITH THE OTHER INMATE DFANNY
FOSTER TOLD SERGEANT a AaRON, YOU ALL JUST WANT TO JUMP ON ME
AND MAKE ME YOU'LL HAVE DONE IT ONE (1) TIME, BY THAT TIME
OFFICER Cage, TOLD DANNY FOSTER TO GO AHEAD IN CELL
W-24 DON'T MAKE THEM JUMP ON YOU, YOUR A GOOD GUY. DANNY FOSTER
WENT ON INTO SEG W-24, AFTER DANNY FOSTER TOLD HIS WIFE ALL OF
THIS DANNY FOSTER ASKED HIS WIFE DID SHE CALL THE DIRECTOR OF
CLASSIFICATION IN MONTGOMERY TO SEE IF SHE HAD RECEIVED MY LETTER
DANNY FOSTER'S WIFE SAID YES, THE DIRECTOR OF CLASSIFICATION
SECRETARY GOT THE LETTER, DANNY FOSTER SAID OK, DANNY FOSTER
HUNG UP THE PHONE AND WENT TO HIS CELL SEG W-24 DANNY FOSTER
WAITED FOR A FEW DAYS AND DANNY FOSTER CALLED HIS WIFE BACK, AND
TOLD HER TO CALL THE DIRECTOR OF CLASSIFICATION IN MONTGOMERY
TO FOLLOW UP ON A LETTER HE WROTE TO THE DIRECTOR OF
CLASSIFICATION IN MONTGOMERY, THE SECRETARY TOLD DANNY FOSTER'S
WIFE THAT SHE HAD NOT OPENED UP THE LETTER YET, DANNY FOSTER

SAID OK, AND TOLD HIS WIFE TOKEEP CHECKING AND HUNG UP THE PHONE AFTER BEING IN SEGREGATION FORALMOST TWO (2) YEARS DANNY FOSTER WENT BACK TO THE SEG BOARD TOSEE WARDEN MIREE AND MRS BONNER TOLDDANNY FOSTER THAT SHE HAD TOGIVE HIM HIS ANUAL REVIEW DANNY FOSTER TOLD MRS BONNER THAT HE WASDN'T THERE TO TALK ABOUT ANY ANUAL REVIEW, DANNY FOSTER TOLD MRS. BONNER THAT SHE COULD HAVE CALLED HIM TO THE WEST CLASSIFICATION UNIT FOR THAT,WARDEN MIREE SAID THAT THIS WAS DANNY FOSTER'S ANUAL REVIEW BEING CONDUCTED AT THE SEG BOARD, MRS.BONNER THEN READ OFF TO DANNY FOSTER THE RESULTS OF THE ANUAL REVIEW,AND ASKED DANNY FOSTER WAS HE GOING TO SIGN HIS RESULTS OF THE ANUAL REVIEW, DANNY FOSTER SAID YES HE WOULD SIGN IT, DANNYFOSTER ASKED WARDEN MIREE WHEN HE WOULD B E RELEASED FROM SEGREGATION HE DIDN'T HAVE A DISCIPLINARY OR CITATION, AND THAT HE HAD BEEN BACK THERE IN SEGRGATION ALMOST TWO(2) YEARS.

WARDEN MIREE TOLD DANNY FOSTER THAT SHE WOULD LOOK INTO IT, DANNY FOSTER SIAD OK, CAN HE LEAVE NOW, WARDEN MIREE SAID YES YOUMAY GO. DANNY FOSTER WENT BACK TOHIS CELL IN SEG W-24 AFTER ABOUT ONE (1)WEEK TO ONE (1)MONTH A OFFICER CAME AND ASKED DANNY FOSTER TO SIGN A LIVING AGREEMENT, DANNY FOSTER TOLD THE OFFICER THAT NO HE WASN'T GOING TO SIGN ANY LIVINMG AGREEMENT THE OFFICER SAID,YOUR NOT, DANNY FOSTER SAID NO, THE OFFICER LOOKED AT DANNYFOSTER, AND WALKED OFF, ABOUT THIRTY (30) MINUTES OR SO LT JENKINS CAME BACK TO DANNY FOSTERS CELL, W-6 AND SAID THESE EXACT WORDS (' IS THERE A MOTHERFUCKER DANNY F.OSTER BACK

HERE', DANNY FOSTER CAME TO HIS CELL TRAY HOLE AT W-6 AND SAID YES SIR, LT JENKINS PASSED DANNY FOSTER SOME PAPER AND DANNY FOSTER ASKED LT JENKINS WHAT IS THIS, LT JENKINS POINTED AT THE PAPER AND SAID SIGN RIGHT FUCKING HERE, DANNY FOSTER ASKED LT JENKINS COULD HE READ THIS FIRST, LT JENKINS SAID SIGN RIGHT FUCKING HERE DANNY FOSTER SAID OK, BECAUSE I DON'T WANT YOU TO

JUMP ON ME ANYMORE DANNY FOSTER ASKED LT JENKINS DID HE HAVE A PEN, LT JENKINS PASSED DANNY FOSTER A PEN, DANNY FOSTER SIGNED THE PAPER AND PASSED THE PEN BACK TO LT JENKINS THEN LT JENKINS LEFT ABOUT A WEEK OR TWO LATER DANNY FOSTER WAS RELEASED FROM SEGREGATION AFTER DANNY FOSTER WAS RELEASED FROM SEGRGATION A OFFICER TOOK DANNY FOSTER TO I.C.S THE I.C.S OFFICER OFFICER SNELSON TOLD DANNY FOSTER THAT HE WAS GOING TO MOVE DANNY FOSTER BACK TO A & B BLOCK DANNY F.OSTER TOLD OFFICER SNELSON THAT HE DIDN'T WANT TO GO BACK TO A & B BLOCK BECAUSE OFFICER YOUNG HAD JUMPED DANNY FOSTER AND WAS ASSIGNED TO A & B BLOCK AND DANNY FOSTER IS AFRAID THAT OFFICER YOUNG WAS GOING TO JUMP ON HIM AGAIN DANNY FOSTER HAD TOLD THE SEG BOARD ABOUT THIS THE I.C.S. OFFICER, OFFICER SNELSON SAID THAT HE DIDN'T THINK THAT OFFICER YOUNG WAS LIKE THAT, DANNY FOSTER TOLD THE I.C.S OFFICER OFFICER SNELSON THAT HE WANTED TO MOVE TO THE SOUTH SIDE TO O DORM, PLEASE DON'T PUT ME AROUND OFFICER YOUNG, WHAN HE HAD JUMPED ON ME, THE I.C.S OFFICER OFFICER SNELSON TOLD DANNY FOSTER THAT HE, SEE THAT DANNY FOSTER IS REALLY AFRAID, SO THE I.C.S. OFFICER, OFFICER SNELSON TOLD DANNY FOSTER THAT HE WAS GOING TO GO ON AHEAD AND MOVE DANNY FOSTER TO THE SOUTH-SIDE IN O DORM.

2. RELIEF SOUGHT

THE PLAINTIFF DANNY FOSTER REQUESTS THE FOLLOWING RELIEF IN THIS CAUSE FROM EACH OF THE DEFENDANTS NAMED IN THIS CIVIL COMPLAINT IN THEIR PERSONAL CAPACITY

1. DEFENDANT LT JENKINS PUNATIVE DAMAGES IN THE AMOUNT OF \$ 50.000 FOR THE DEFENDANT LT JENKINS ASSAULT UPON THE PLAINTIFF

2. DEFENDANT OFFICER YOUNG PUNATIVE DAMAGES IN THE AMOUNT OF \$50.000 FOR THE DEFENDANT OFFICER YOUNG ASSAULT UPON THE PLAINTIFF

3. DEFENDANT OFFICER EDDIE WATTS PUNATIVE DAMAGES IN THE AMOUNT OF \$50.000 FOR DEFENDANT EDDIE WATTS FAILURE TO PROTECT THE PLAINTIFF AGAINST THE ASSAULT UPON THE PLAINTIFF BY DEFENDANT LT JENKINS, DEFENDANT OFFICER YOUNG AND DEFENDANT OFFICER GASTON

4. DEFENDANT OFFICER GASTON PUNATIVE DAMAGES IN THE AMOUNT OF \$50.000 FOR DEFENDANTS OFFICER GASTON ASSAULT UPON THE PLAINTIF

5. DEFENDANT OFFICER HAYWOOD PUNATIVE DAMAGES IN THE AMOUNT OF \$50.000 FOR DEFENDANT OFFICER HAYWOOD FAILURE TO PROTECT THE PLAINTIFF AGAINST THE ASSAULT OF DEFENDANT LT JENKINS DEFENDANT OFFICER YOUNG AND DEFENDANT OFFICER GASTON

5. DEFENDANT OFFICER PARKS PUNATIVE DAMAGES IN THE AMOUNT OF \$50.000 FOR DEFENDANT OFFICER PARKS FAILURE TO REPORT, DOCUMENT, AND ADVISE HIS SUPERVISORS OF THE ASSAULT UPON THE PLAINTIFF BY DEFENDANTS LT.JENKINS, OFFICER YOUNG AND OFFICER GASTON

7. DEFENDANT LT SHEPARD PUNATIVE DAMAGES IN THE AMOUNT OF

\$50.000 FOR DEFENDANT LT SHEPARD FAILURE TO INVESTIGATE,

DOCUMENT, THE ASSAULT UPON THE PLAINTIFF, AND FOR DEFENDANTS

LT SHEPARD FAILURE TO REMOVE THE PLAINTIFF FROM THE WILLIAM

E. DONALDSON CORRECTIONAL FACILITY TO A SAFE PLACE AWAY FROM

THE DEFENDANTS LT JENKINS, OFFICER YOUNG, OFFICER GASTON

8. DEFENDANT ANGELA MIREE WARDEN 2 PUNATIVE DAMAGES IN THE

AMOUNT OF \$ 50.000 FOR THE DEFENDANT ANGELA MIREE WARDEN 2

FAILURE TO INVESTIGATE, DOCUMENT THE ASSAULT UPON THE PLAINTIFF

AND THE DEFENDANT ANGELA MIREE WARDEN 2 FAILURE TO REMOVE THE

PLAINTIFF FROM THE WILLIAM E. DONALDSON CORRECTIONAL FACILITY TO

A SAFE PLACE

9. DEFENDANT MRS BONNER CLASSIFICATION SUPERVISOR PUNATIVE

DAMAGES IN THE AMOUNT OF \$50.000 FOR DEFENDANT MRS. BONNER

CLASSIFICATION SUPERVISOR FAILURE TO INVESTIGATE, DOCUMENT THE
ASSAULT UPON THE PLAINTIFF AND DEFENDANT MRS BONNER CLASSIFICATIO

SUPERVISOR FAILURE TO REMOVE THE PLAINTIFF FROM THE WILLIAM

E. DONALDSON CORRECTIONAL, FACILITY TO A SAFE PLACE AND THE FAILUR

OF THE DEFENDANT MRS BONNER CLASSIFICATION SUPERVISOR TO INFORM

CENTRALCLASSIFICATION OF THE ASSAULT UPON THE PLAINTIFF, AND THE

NEED FOR TRANSFER PROCEDURES TO BE IMPLIMENTED. UPON THE PLAINTIF

10. DEFENDANT SERGEANT AaRON PUNATIVE DAMAGES IN THE AMOUNT OF

\$50.000 FOR THE DEFENDANT SERGEANT AaRON FAILURE TO NOTIFY

HIS SUPERVISORS P OF THE ASSAULT UPON THE PLAINTIFF AND IMMEDIATE

DANGERS BYNOT REMOVING THE PLAINTIFF FROM THE WILLIAM E. DONALDSO

CORRECTIONAL FACILITY DUE TO THE ASSAULT UPON THE PLAINTIFF

BY THE DEFENDANTS LT JENKINS, OFFICER YOUNG AND OFFICER GASTON

11. DEFENDANT OFFICER SNELSON PUNATIVE DAMAGES IN THE AMOUNT OF
\$50.000 FOR THE DEFENDANT OFFICER SNELSON FAILURE TO INFORM
HIS SUPERVISORS TO THER DANGERS OF NOT REMOVING THE PLAINTIFF
FROM THE WILLIAM E.DONALDSON CORRECTIONAL FACILITY DUE TO THE
ASSAULT UPON THE PLAINTIFF BY DEFENDANTS LT.JENKINS, OFFICER
YOUNG, AND OFFICER GASTON

3. WHEREFORE PREMISES CONSIDERED PLAINTIFF MOVES THIS HONORABLE
COURT TO GRANT THE RELIEF REQUESTED WITHIN THIS 42 USC | 1983
COMPLAINT AND AFFORD THE PLAINTIFF A CIVIL JURY TRIAL.

DONE THIS THE 29 DAY OF NOVEMBER 2017

RESPECTFULLY SUBMITTED



DANNY FOSTER
AIS# 167673
WILLIAM E.DONALDSON CORRECTIONAL FACILITY
100 WARRIORLANE
BESSEMER, ALABAMA 35023