

2011 May-23 PM 03:16  
U.S. DISTRICT COURT  
N.D. OF ALABAMA

1983 Form

In the United States District Court  
For the Northern District of Alabama

Original  
Complaint 02

WILLIAM HENRY HARRIS JR. <sup>ATS#</sup> 240945.

Jury Trial Demanded.

(Enter above the full name(s) of the  
plaintiff(s) in this action)

CV-11-AR-1646-M

v

Reginald Rambo, Gregory Gaston, Veronica King,  
COZ Nate, COZ Citron, Sued in their individual capacities.

Sgt. Michael Wheat, LT R. Felton, Warden Hicks  
and Warden Gary Hetzel sued in their individual and official capacities.  
(Enter above full name(s) of the  
defendant(s) in this action)

I. Previous lawsuits

- A. Have you begun other lawsuits in state or federal court(s) dealing with the same facts involved in this action or otherwise relating to your imprisonment? Yes (✓) No
- B. If your answer to A. is "yes", describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuit(s) on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit

Plaintiff(s): WILLIAM HENRY HARRIS JR.

Defendant(s): COZ LORENZO HAYWOOD

2. Court (if Federal Court, name the district; if State Court, name the county)

U.S. DISTRICT COURT, SOUTHERN DIVISION

3. Docket Number 2:10-CV-01333-IPJ-PWG

4. Name of judge to whom case was assigned Paul W. Greene

Chief Magistrate Judge

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

yes, The Excessive Force Case is still pending.

6. Approximate date of filing lawsuit May 12th 2010.

7. Approximate date of disposition N/A

II. Place of present confinement W.E. Donaldson Correctional Fac. 100 Warrior Lane Bessemer, AL 35023

- A. Is there a prisoner grievance procedure in this institution?

Yes (☒) No (☐)

- B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?

Yes (☒) No (☐)

- C. If your answer is YES:

1. What steps did you take? I notified the Head Warden, Assistant Warden, Capt. Tew,

LT. Ray Burns, Sgt. M. Willett. I wrote Declarations to all. I submitted complaints to the  
governor's office, commission's office, President of the U.S.A., NAACP, SCLC, AIA, Dept. of Personnel &

2. What was the result?

At this facility? There have been no action taken what so ever! But from  
other organizations? I have received assault forms to complete and return!

- D. If your answer is NO, explain why not?

### III. Parties

In item A below, place your name(s) in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.

- A. Name of plaintiff(s) WILLIAM HENRY HARRIS JR. A# 240945, W.E. Donaldson  
Correctional Fac. 100 Warrior Lane Bessemer, Ala. 35023.

Address \_\_\_\_\_

In Item B below, place the full name of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use Item C for the names, positions, and places of employment of any additional defendants.

- B. Defendant Reginald Rambo  
 is employed as Correctional Officer  
 at W.E. Donaldson CORR. FAC. 100 WARRIOR LANE BESSEMER, AL. 35023.
- C. Additional Defendants GREGORY GUSTON COI, VERONICA KING COI, CITRON COI, NATE COI,  
Sgt. M. Wheat, LT. B. Feltom, Assistant Warden Hicks, Head Warden Gary Hetzel  
all are currently employed here at W.E. Donaldson CORR. FAC. 100 WARRIOR LANE  
Bessemer, AL. 35023

#### IV. Statement of Claim

State here, as briefly as possible, the FACTS of your case. Describe how each defendant is involved. Include, also, the names of other persons involved, dates and places. *Do not give any legal arguments or cite any cases or statutes.* If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheets, if necessary.

CLAIM 1. Cause C-2 Action, I plaintiff WILLIAM H. HARRIS JR #240945, allege's that the following of my  
 Constitutional Rights, privileges, and immunities have been violated: Claim 1# On January 30th 2011  
 in the E.F.G.H. (6-Block) segregation housing unit, on the H-side dormitory area. While I W. Harris,  
 were occupying a Barbours chair, attending the annual segregation Hair cut Routine, with both of  
 my hands being Restrainted to the back Barb side cover by a pair of hand cuffs. I was purposefully

Attacked by another inmate, Curtis Lynn, while being under the care and supervision of a penit  
 COI Officer Reginald Rambo. I was later informed while being personally escorted to the medical  
 unit, by this same Officer Reginald Rambo, that (Quote) "If you continue to pursue that civil claim  
 against my Home boy (Lorenzo Hayward) Everytime that (un) speaking of His self Officer Reginald Rambo  
 and His fellow co-worker Officer Lorenzo Hayward, would Have you attacked until you see that  
 your own life is more valuable than that suit. (UnQuote) The assailant/inmate Curtis Lynn, was

under the institutional security level of "No contact" and "lock alone status". Which means inmate Curtis Lynn was not to be around no one unless it was a DOC official, and He must at all times wear a pair of leg irons and Hand cuffs before he is eligible to be removed from out of his cell. In this event of a attack, inmate Curtis Lynn was Released from his cell by Officer Reginald Rambo free of any of the Required Restraints. After the assault, inmate Curtis Lynn was Relocated to another side. Claim 2<sup>nd</sup>. Eighteen days later On February 17th 2011 at or approximately 6:45 AM

#### V. RELIEF

State briefly *exactly* what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

A) Issue a Preliminary Injunctive Relief, against plaintiff and the named Defendants.

B) Award Compensatory damages in the following amounts:

1.) \$50,000 jointly, and severally against each defendant for the pain suffered and the abuse that continued on (3) different separately accounts. For the Broken nose, permanent Back pains, etc.

C) Award Punitive damages in the following amounts:

1.) \$15,000 against each defendants. And Grant such other Relief as it may appear deemed to the Plaintiff. Plaintiff also requests that all court cost be taxed to the Defendants.

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

Executed on April 5th 2011  
(date)

William Henry Morris Jr. #240945  
Signature(s)

Original Copy

Continuation

Claim 2<sup>nd</sup>

Officers COZ Reginald Rambo, COZ Gregory Gaston, COZ Citron, COZ Nade and a cubicle officer COZ MS.

- 1.) Veronica King; were all assigned to perform duty here at the E, F, G, H (6-Block) segregation housing unit. As COZ MS. V. King, did remain inside the cubicle area to purpose the operations of the seg. housing unit control panels. Officers Reginald Rambo, Gregory Gaston, COZ Citron and COZ Nade, all did in fact entered the H-side dormitory area in the E, F, G, H, 6-Block seg. housing unit to get any
- 2.) Inmates that wanted to participate in the seg. Morning Exercise. Inside each unit 'E' through 'H' unit there are a top tier and bottom tier both containing a numerical order of (twelve) cells each respectively; 1-12 contains the bottom half and 13-24 contains the top tier. Both officers Reginald Rambo and Gregory Gaston did approach the top tier cell numbers 13-24, while below both officers COZ Citron and COZ Nade approached cell numbers 1-12.
- 3.) At approaching I William Harris Jr, cell which was cell H-16<sup>th</sup>. A peer COZ officer R. Rambo did knock upon my cell window, and asked did I wanted to participate in the morning exercise I W. Harris, did acknowledge that I did, and was told by Reginald Rambo, to get ready, which I did comply with. After several passed minutes of attending to my personal Hygiene, I was approached this time by COZ G. Gaston who asked me was I ready yet? I informed Mr. G. Gaston, that I was; and I was ordered to turn around
- 4.) Facing my back side areas towards the cell 6 1/2 in length and 12 inches in width feeding tray slot to be hand cuffed, which is protocol, so I eagerly complied. After officer G. Gaston did place the hand cuffs upon both of my wrist and securing them by double locking them, (He) officer Gaston signalled for Ms. Veronica King, the cubicle operator to open my cell door, which by the cubicle operator doing so I was then able to observe officer R. Rambo, leaning with his bodyweight back against the cell
- 5.) Cell next door to mine, which was H-17<sup>th</sup> cell, looking at the cubicle operators Ms. Veronica King, Officer Gaston, commanded me to back up further back into the cell away from the cell entrance, which is very unusual. Even if this cell was called "a Routine cell search"? The searching officer would cuff the

Continuation: Claim 2<sup>#</sup>

- Inmate up first, and then 'always' order the inmate to come out the cell, not the totally opposite.
- 6.) But seeing that I had no choice, I complied anyway! and backed up backwards inside the recess of cell H-K<sup>#</sup> living quarters. Officer Gaston, then engaged inside the cell also and grabbed the collar part of my shirt, and forced me face first into the wall with his left arm, while very roughly patting down the wrist, chest and leg area with his right hand.
- After seeming satisfied with his actions, Officer Gaston released my shirt collar, and I heard
- 7.) Officer Reginald Rambo, enter the cell now and told officer Gaston, to turn him around. Officer Rambo, then punched (me) on the left side facial area with his left hand, then (he) officer Rambo, again with his left hand, seized hold of my throat, and placed his aerosol deterrent spray (Freeze Plus P) canister of mace in the middle of my facial area with his right hand and
- (Quoted) "You don't know who you are fucking with," "I will kill you, cover up the scene and come
- 8.) back to work tomorrow as if nothing ever happened!" "Open your mouth Bitch!" (Unquote)  
I just stood there Helpless and silent, as officer R. Rambo, then sprayed his whole can of (Freeze Plus P) mace over my entire facial area, while attempting several times at trying to push the tip of the can nozzle between my lips and clenched teeth. I still refused to open my mouth.
- So both officers Gaston, and Rambo, began to beat me viciously as if I, were a plastic punching
- 9.) bag instead of a human being. The abnormalities of this punishment was so intense that after every kick or punch that was issued, the little wind that I was fighting so hard to hold on to would instantly get knocked completely out from my lungs, as is; it's very very difficult to breathe while being under the effects of that type of mace!! I was beaten with a night stick
- Elbowed several times in the rib cage, stomped upon and slapped numerous times inside of
- 10.) my small cell, laying in a corner bleeding beside the cell toilet for approximately 30 minutes before I lost consciousness. I can not tell with the acuity of my recollection of this incident nor place an accurate time estimate of how long that I was forced to lay Hands



cuffed behind my back, bleeding unconsciously! But I could re-cul be my cuffed back up with great actuality by a blow to the left side of my head by some very hard unknown object! The whole cell had so much "mace" sprayed inside it and upon me that I Heard both of the attacking officers gagging and coughing; stopping to walk half way out of the cell to retrieve some fresh air, then continue the assault! As the act of premeditated

Guard Brutality endured, Both officers COZ Citron and COZ Nate, was still at the bottom tier  
 12.) ordering all those out coming inmates that consented to exercise, to come out of their cell and stand gathered together under the staircase by 12<sup>th</sup> cell; while this cubicle control officer Ms. Veronica King, only continued to stand at the control panels, clearly looking on the H-side dormitory area, Because Ms. King, was still disengaging the remaining bottom row cell's to be let out. Both

officers Reginald Rambo, and Gregory Gaston, each grabbed a pairs kg of mines, and dragged me  
 13.) by the cuckles out of my cell H 16<sup>th</sup> out now upon the top tier, dragging me towards the stairs, and slammed my face against the side railing protector, yelling (Quote) A per: R. Rambo, "tell this Bitch" "Talk that shit now pretty Fly Boy, he told you that this shit is not a game, do you think that you just could file a civil suit, and think we were not going to do anything?" (Unquote) After each

Threat or question, I in return received a Kick or punch! Once I was dragged to the top of the  
 14.) stair case (a flight of 21' in total reinforced bars and steps.) Officer Rambo, picked me up and pushed me, to my surprise (while still bearing the restraints of hand cuffs to the rear area) down those 21' flight of steps face first! I fell down at least (15) steps, until I hit upon impact my right side of the head, against the metal rail, where I caught my balance by holding

The lower rail, with the rest of my body turned unbelievable disfigured looking with the metal  
 15.) cuffs ripping through the flesh of my wrist, while I sustained to hold on for dear life! Officers both Gregory Gaston and Reginald Rambo, came walking down the stairs behind me, and ordered me to stand up! I refused! and I got kicked in the back, down the last remaining (6) steps by the

back of R. Rumba, I landed four first creating an incision upon my hip and nose area! Both officers  
 16.) R. Goston and R. Rumba, both dragged me across the lower day space area out into the outer corridor  
 leading into the main hallway. Where I was picked up and tossed across a wooden table and beside  
 some more by both officers R. Goston and R. Rumba, until finally officer COI Citron, ran from end  
 of the H-side area into the Hall and sprinted towards the door leading into the main hallway.

Ms. V. King, opened the main door for officer Citron, until both officers Rumba and Goston, yelled  
 17.) in union at officer Citron, to close the main outer door back shut! Officer Citron, yelled back  
 with his hands still attached to the door handle (what?) and officers Rumba, was said (no) not like that.  
 Just call us a supervisor. Neither officer Rumba nor Goston, discontinued their brutal attack upon me.

A LT. Felton, arrived at the E, F, G, H, (A-Block) main outer door, and personally  
 18.) observed both of his lower ranking officers assaulting me while being held bent over the  
 wooden table! LT. Felton, ordered both officers to discontinue their attacks! Both officers  
 R. Goston and R. Rumba, was so entranced into their act of gross brutality, that their  
 supervisor LT. Felton, had to order twice with much authority to get both officers to stop the

Abuse LT. Felton, then ordered both officers to back away as (He) LT. Felton, summoned another officer  
 19.) a COI Barber, who were assigned to monitor the East hallway, to escort me to the medical unit.  
 once I was gathered and escorted down the hallway. I fell out! I was later awoken by the  
 feel of cold water running over my face, which at this point I was being held up under a medical  
 portable shower by each arm to keep me balanced and standing up right, by (two) officers

20.) That I couldn't see! I was then approached by a per. Sergeant Michael Wheat; I inquired to know  
 this sergeant identity before I gave my allegations, due til the fact that I still have not regained  
 my eye sight back yet. Sergeant Michael Todd Wheat, asked me what happen and why did his  
 guards had jumped upon me? As I began to recite the whole act of gross brutality from it's



- Sequential order, Sergeant McWheat, told me (quote) "Shut the fuck up, you shouldn't have been taken smart to my officers, you get exactly what you deserved to get!" (Unquote) I complied and didn't speak another word, just out of pure spite, I didn't want to never experience another brutality as that one that I, just barely survived! Afterwards, I was allowed to see the medical nurses, then I was replaced back into the same unit, the same maxed cell, and was not therefore allowed to
- 22.) Shower, or change the bloody max stained clothing! Instantly by the placing of I, back into the poorly ventilated small deteriorated cell; I went through many complications of Breathing which combined with intense dizzy spells and head aches! Which all was the result of smeared max everywhere upon the walls where the act of this cruel and unusual punishment first took it's course, on all of my writing materials, Bed linen's and on me and the clothing that
- 23.) I still had on! (2) hours later, I still remained in the same conditions and cell! A officer whom I, don't know was walking the top tier doing a "institutional count," I stopped this Officer and inquired if it was possible for I, to obtain a (10) minute cold shower that's protocol and required after an inmate has been sprayed with max. I also requested for any cleaning utensils that were available to clean the cell and some fresh bed linen's. I
- 24.) Was bid to shut the fuck up, and sit my ass down, by this unknown passing officer! (3) hours later which is a total of (5) hours that I, have been sitting inside this cell after the attack. I began to Hyperventilate and vomit off and on; Some where between the vomiting and Hyperventilating, A knock came upon my cell window by Cox Officer Nete; and ordered me to pack up all of my personal belongings because I was being relocated from this E, F, G, H, A Block

Unit to another segregation V-W Housing lock up unit. The relocation to another fresh cell did 25.) bring a temporary relief (Ventilation wire) But I, was never allowed to shower, nor change the clothing or maxed bed linen's after the movement on this A-Day shift which the guard brutality did happen on! I had to wait until that next shift which was B-Day shift to arrive

at their appointed shower time, which is at 7:00pm just to finally wash, the chemicals off of me and receive the fresh clothing and bed spread liners! I then began my informed and formal complete use's to exhaust this prison complaint system. I wrote petitions, complaints and sworn declarations. out into this administrative powers, to this facility captains, LT's. and both wardens the Assistant Warden Hicks, and the head warden Gary Hetzel...

Claim 3<sup>#</sup> On March 2<sup>nd</sup> 2011 at or approximately 4:15 pm a full search riot squad unit was assembled

1.) and ordered to search the complete housing unit of V-W segregation

Officers Lorenzo Hayward, who are currently a Respondent in civil claim case No 2:10-cv-

2.) 01333 for the use's of "Excessive Force" did approach I William H. Hoxie's Jr. #240945.

cell along with (Four) other co-workers and members of the riot squad unit, as follows A

Officer Reginald Rambo, R. Gaston, and two other unknown officers that works at another facility

But does serve together when a riot search unit is assembled!

On this March 2<sup>nd</sup> 2011 (5) officers did gather around my cell-W 43<sup>#</sup> and ordered me to

3.) approach the door. Officers Gaston, Rambo, Hayward and the (2) unknown members of the search team. Officer R. Rambo, did order me to get completely naked, out of a pair of boxers, shirt and socks! As I complied, Officer Rambo, told me to turn around squat and cough, then come to the feeding tray area to be hand cuffed up. Once I was hand cuffed officer R. Rambo, signalled for the V-W cubicle operator a per: Mr Williams, to roll the cell door of W-43.

Officers R. Rambo, G. Gaston and the other (two) unknown officers did enter my cell while

4.) Officer Lorenzo Hayward, stood in the doorway watching out for the (4) members of the riot squad! Officer R. Rambo ordered me to place my under garments back on while still being hand cuffed to the reex area; half way dressed R. Rambo, commenced to slapping me

which started the other (3) officers G. Gaston, and the two other unknown officers to participate  
 5.) in on the assault, while officer L. Haywood, took the post of my outer cell door looking on as the guard brutality continued, and keeping a eye out for any passing supervisors. As the abuse prolonged officer R. Rambo, told the other three following guards officer Gaston and the other two unknown officers, (quote) per: R. Rambo, "yall gone ahead and finish this bitch while I go lock out!" (Unquote) I was beaten and threaten by these officers until another

unknown riot squad member who was passing by upon the top tier, stopped at my door, seen  
 6.) what was transpiring and started laughing stating (quote) "yall don't have too much fun we still have a half of a unit that needs to be shook down!" (Unquote) After this unknown officer departure, I was released from my cell and the abuse. But not before I received some additional slaps and threats (5) minutes later. Afterwards I immediately went to inform the nearest riot squad supervisor. I located a riot squad LT. "who's name is also

unknown!" The unknown riot unit Lieutenant. asked me (quote) "what's wrong?" and what happen  
 7.) to my neck! (indicating the finger markings that was imprinted around my neck.) I told the riot squad LT. what happen since his unit first stepped into the V-W, Housing Seg. Unit; and up to my cell! I gave this LT. the names of Reginald Rambo, Gregory Gaston, Lorenzo Haywood, and to the best of my ability, the description of the other (two) officers that I clearly did not know. This LT. told me that once my cell was finished being searched (it) would personally escort me

back to the cell, to ensure that no further harm was issued! And as promised this unknown riot  
 8.) squad LT. did escort me back to my cell and made those same (5) officers R. Rambo, G. Gaston, L. Haywood and the unknown other (two). to leave away from my cell where they were just hanging around awaiting on my return, as it was clear to see that their search was complete at my cell! The very next day on March 3<sup>rd</sup> 2011, I informed another seg. supervisor which

9.) A LT. Rayburn, about the abuse, pain and threats that I have been receiving on the regular at

- this facility! LT. Ray Buer, told me that he has spoken with my family members several times ago, pertaining the same concerns; and Mr. LT. Ray Buer, told me to give him a (Declaration) "A hand written statement" following the incident on March 2<sup>nd</sup> 2011.
- Afterwards a week 1/2 later I was re-located back to the E, F, G, H, 4-Block seg. Housing unit H-side dormitory in H-9 cell! I inquired to both wardens a per: Warden Hicks, and the Head warden Gary Hetzel, himself as to why? I am being forced to live around these
- Some officers who are the exact same officers Reginald Rumba, and Gergory Gaston, who has beat
- 11.) me several times! And officer Ms. Veronica King, who rolled my cell door on the Feb. 17<sup>th</sup> 2011. attack so that the guards could beat me. And officers Citron and Nite, who clearly was put on notice beforehand about the mis-deeds in the Feb. 17<sup>th</sup> 2011. guard brutality, and did nothing to prevent the harm and constitutional violations! All of these officers, is the permanent officers to perform duty here at this E, F, G, H, 4-Block seg. Lock up unit on the A Day shift.
- I complained to Warden Gary Hetzel, that after several attacks by either of these listed
- 12.) officers or conspiratory, I didn't feel safe at all! And I requested to be removed back to another unit where me and these officers R. Rumba, G. Gaston, Citron, Nite went have to be living within a conflict of interest! This Head appointee of a warden never responded to my petitions, nor to my urgent pleadings or my declarations pertaining the (2) separate incidents of guard brutality! until this day and moment there has been no
- 13.) investigation, nor has anyone of this wardens, even attempted to talk to me pertaining my physical harm suffered or to rectify any mis committed acts as the law purposes!
- 14.) I then inquired every week, thru the weekly seg. Board meetings to speak with this warden Hicks, whom are the assistant warden at this facility and whose over segregation at this facility! Mr. Warden Hicks, told me that (he) would not move either one of these officers that was involved in claim 1.<sup>#</sup> 2.<sup>#</sup> and 3.<sup>#</sup> Warden Hicks (Quoted) I don't know when

move you out of this unit speaking of the (E, F, G, H 6-Block unit) over into the 140 seg. unit!

15.) But per: my orders no one would be removed! which is why, I Have moved you back to the E, F, G, H, 6-Block seg. unit to H 9-cell. I am highly aware of your complaints and situation between my officers and you; But no (one) would be removed "due til the Post I feel's" that (my) officers would act professional!" (UnQuote) I have informed this seg. warden Hicks, on numerous occasions that I, have been having problems out of these same officers.

I Have denied every medical treatment sick call screenings on this A-day shift, due til

16.) the fact it would always be either officer Reginald Rambo, or Nate, or Gregory Guster, that would come to my cell to escort me to the medical unit! So I would refuse out of pure fear, that they might place me back in hard cuffs' tricking me like I am going to the infirmary and attack me again. I don't get hair cuts every saturday, while the rest of the segregation does. out of fear that these officers may attack me again; and

They only allow us to get haircuts on the A-day shift each saturday! I Has complained

17.) to both wardens about all of this, along with the fact I am being (forced) to be deprived not to exercise anymore on the A-day shift, nor eat any of my meals on this A-day shift because these officers would always come to my cell to get me to exercise, and therefore they remains to be the same ones whom places each individual their meals to them to eat. Officer R. Rambo and Guster, Both on different occasions Have spit their saliva into my

Meals in my face! I informed Mr Hicks, about these and other injuriously act's; and I was

18.) only told in return by this Assistant warden Hicks (Quote) "I don't believe that my officers would act as immature as you claims!" (UnQuote) I then wrote the head warden Mr. Gary Hetzel, and informed Mr. Hetzel, that his segregation Assistant Warden Mr Hicks, are creating a policy of hands on queued brutality, By allowing this incident to transpire without executing any investigations, or disciplinary sanctions from these actions being committed by these officers.

I also informed this Head Warden Gary Hetzel, that due to the condoning of these officers actions

19.) it is merely impossible for I, to sleep, eat, exercise or get a hair cut while this A-Day shift works.

Mr. Gary Hetzel, never even attempted to bring remedy upon any of my sufferings!

20.) Defendant Gary Hetzel, is the Head Warden of this W.E. Donaldson CORR. Fac. He is legally responsible for the operation of W.E. Donaldson Correctional Facility, and for the welfare of all the inmates of this prison

21.) Defendant Mr. Hicks, is the Assistant Warden of this W.E. Donaldson CORR. Fac. He is legally responsible for the operation of this W.E. Donaldson Correctional Facility Administrative Segregation and for the welfare of all the inmates of this prison

22.) Defendant Reginald Rambo, is a Correctional Officer, of the ADOC who at ~~this~~ all times mentioned in this complaint, held the rank of COZ, and was assigned to W.E. Donaldson Correctional Fac. Admin. Segregation

23.) Defendant R. Gaston, is a Correctional Officer, of the ADOC who at all times mentioned in this complaint, held the rank of COZ, and was assigned to W.E. Donaldson CORR. Fac. Admin. Segregation

24.) Defendant Nade, is a Correctional Officer, of the ADOC who at all times mentioned in this complaint held the rank of COZ, and was assigned to W.E. Donaldson CORR. Fac. Admin. Segregation

25.) Defendant Lorenzo Heywood, is a Correctional Officer, of the ADOC who at all times mentioned in this complaint, held the rank of COZ, and was assigned to W.E. Donaldson CORR. Fac. population

26.) Defendant Citron, is a Correctional Officer, of the ADOC who at all times mentioned in this complaint held the rank of COZ, and was assigned to W.E. Donaldson CORR. Fac. Admin. Segregation



- 27.) Defendant Ms. Veronica King, is a correctional officer of the ADOC who at all times mentioned in this complaint held the rank of CO2, and was assigned to W.E. Donaldson CORR. Fac. Admin. Segregation.
- 28.) Defendant Michael Wheat, is a correctional officer of the ADOC who at all times mentioned in this complaint held the rank of CO2, Sergeant, and was assigned to W.E. Donaldson CORR. Fac. Seg./population.
- 29.) Defendant R. Feltus, is a correctional officer of the ADOC who at all times mentioned in this complaint held the rank of Lieutenant, and was assigned to the W.E. Donaldson CORR. Fac. Seg./population.
- 30.) Each defendant is sued individually and in his/her official capacity. At all times mentioned in this complaint each defendant acted under the color of state law.
- 31.) Plaintiff avers that Defendant Reginald Rambo, committed the following violations of Negligence, Intentional Retaliation through the means of guard brutality and a campaign of Harassments and the deprivation of a Basic Human need.
- 32.) The Defendant R. Rambo, act of guard brutality, stems from the Retaliation of plaintiff's civil complaint against co-worker Lorenzo Heywood, And to further prevent plaintiff from having access to the courts, through these forms of repressive "deliberate indifferent" tactics, spitting in the plaintiff's meals, the negligence that was premeditated to allow inmate Curtis Lynn, to assault plaintiff, and the (two) separate guard brutalities committed towards my protected actions.
- 33.) Plaintiff avers that Defendant R. Gaston, committed the following violations of Negligence, Intentional Retaliation through the means of Guard Brutality, and a campaign of Harassments and the deprivations of plaintiff's Basic Human need.
- 34.) The Defendant R. Gaston, acts of Guard Brutality, stems from also the Retaliation of plaintiff's civil complaint against co-worker Lorenzo Heywood. And to further prevent plaintiff from having

access to the courts, through these forms of repressive "deliberate indifferent" tactics, spitting also in the plaintiff's meals; and the (two) separate attacks of guard brutalities directly related towards my protected actions.

35) Plaintiff avers that Defendant COZ Citron, committed the following violations of Negligence and a conspiracy of Guard Brutality; deliberately allowing the cruel and unusual punishment to transpire.

36) The Defendant COZ Citron, violated plaintiff's procedural due process rights, by refusing to intervene or enforce the aim and goals to ensure the safety of both inmate/personnel as it is required by this W.B. Donaldson Standard Operational Procedure; and therefore to prevent the course of Guard Brutality of the named Defendants from taking its course.

37) Plaintiff avers that Defendant COZ Nate, committed the following violations of Negligence and a conspiracy of Guard Brutality; deliberately allowing the cruel and unusual punishment to transpire.

38) The Defendant COZ Nate, violated plaintiff's procedural due process rights, by refusing to intervene or enforce the aim and goals to ensure the safety of both inmate/personnel as it is required by this W.B. Donaldson Standard Operational Procedure, and therefore disregarding to prevent the course of Guard Brutality from the named Defendants from taking its course.

39) Plaintiff avers that Defendant Ms. Veronica King, committed the following violations of Negligence, and a conspiracy of Guard Brutality; deliberately opening the plaintiff's cell door to allow the cruel and unusual punishment to transpire.

40) The Defendant Ms. V. King, intentionally over looked the "rules and procedure" when there ever is to arise a physical disturbance between a officer/inmate interactions. Ms. V. King, abided the officers with the extension of time to commit their act of brutality by not calling her surrounding supervisors when this act first took its first step into a physical stage, as required by

this W.E. Donaldson Standard Operational Procedures.

41.) Plaintiff avers that Defendant Michael Todd Wheat, has violated the Due process and Due process clause of plaintiff's Rights. of Negligence in failing to enforce the proper procedures as it is set forth under this W.E. Donaldson Standard Operational Procedure and to further deprive plaintiff through his unprofessional conduct.

42.) Defendant Sgt. Michael Wheat, is with the authority as a A-Day shift sergeant assigned to supervise the activities of the following named Defendant's R. Rambo, R. Gaston, V. King, Citron and Nite to ensure that the proper procedures were enforced as it is set forth for this Donaldson Facility and negligently failed in his responsibility to comply with his duties to ensure plaintiff's protection, Rights to courts and plaintiff's Rights under the Due process clause, was preserved to have an adequately investigation performed, and through the knowledge of the guard brutality as alleged in claim 2<sup>nd</sup>. Sergeant M. Wheat, demeanor and the order for the plaintiff "to shut up" ending with a statement of condoning the actions of Defendants R. Rambo and R. Gaston, clearly reflects the Deliberate Indifference of a disregard to a condition posing a substantial Risk of a serious harm against the plaintiff.

43.) Plaintiff avers that Defendant R. Felton, has violated the plaintiff's Due process and Due process clause of the plaintiff's Rights, of unprofessional misconduct, Negligence, and failing to enforce the proper procedures upon the Defendants, as it is set forth under this W.E. Donaldson Standard Operational procedure.

44.) Defendant R. Felton, is with the authority as a A-Day shift Lieutenant commander assigned to supervise the activities of his lower ranking officers. R. Felton, has negligently failed in his responsibility to report the personal accounts of this act of committed guard brutality alleged in claim 2<sup>nd</sup> by R. Gaston and R. Rambo. Defendant R. Felton, violated plaintiff's Due process and Due process clause of Rights, when he personally had to "order" both attacking guards (twice) to release the plaintiff and never wrote these officers up, according to their acts. Rather deprived the Standard Operational

Procedure as a corrective measure with this W.E. Donaldson Fac. Defendant R. Felton, violated the (Law) itself to uphold justice and to protect and serve; (By withholding the details personally seen constituting to these two officers R. Rambo and R. Gaston, committing such a heinous act of deprivation in a situation where "inference" was not needed due to this Lt. R. Felton, personally witnessed the <sup>act of</sup> substantiated act of serious harm, and withheld it to further secure the defendants' indifference.

45) Plaintiff avers, that the Defendant Assistant Warden Hicks, Negligently violated plaintiff's Due process and the Due process clause rights, by failing to enforce any corrective statutes, laws, Rules, or even measures to ensure, that the adequately procedures were enforced for the deprivation of plaintiff's suffering the guard brutality and to ensure plaintiff's protection against retaliatory misconduct, and unreasonable harassments.

46) Defendant Assistant Warden Hicks, is with the sole authority as warden at this W.E. Donaldson Fac. to enforce the Standard Operational Procedures as it is set forth in this institution. And has Negligently failed in his responsibilities to use the authority imposed on him in the areas of plaintiff's constitutional protection. Mr. Hicks, violated plaintiff's state and constitutional rights by the disregarding the plaintiff's complaints. The deliberate indifference that continues to arise at this facility while being under the control and authority of this segregation over see. Defendant Hicks, has enhanced the deliberate indifference by disregarding a placement back around these guards which created a basic human need of conflict of interest; and the disregarding of (3) situations that created a substantial risk of serious harm. Defendant Hicks, further disregarded the plaintiff's atypical hardships and significant hardships evolving around these incidents, the abuse and the allowance of these officers to continue to work in close proximity with me.

47) Plaintiff avers, that Defendant Gary Hetzel, is the Head Warden of this W.E. Donaldson Fac. and has violated plaintiff's Due process and Due process clause of rights through the forms of unprofessionalism, negligence and being deliberate indifferent towards plaintiff's complaints, safety, health and the (3) separate incidents surrounding negligence as alleged in claim 1.<sup>#</sup> and the physical abuse of guard brutality that's alleged in both claims 2.<sup>#</sup> and 3.<sup>#</sup> Defendant Gary

Hetzel, thus violated plaintiff's rights when He failed in His responsibility to ensure from plaintiff's  
48. complaint's pertaining Defendant Mr. Hicks, unprofessional conduct and the unconcern about  
His officers actions, therefore my complaint of Assistant Warden Hicks, condoning their actions  
and keeping me in their presence so they could violate me further. Defendant Hetzel, failed to  
ensure that Defendant Assist. Warden Hicks, got in compliance with the standard operational  
Procedures and the law as to prisoners protected constitutional rights as alleged in this case and  
claims 1# 2# 3#

49.) The plaintiff has no plain, adequate or complete remedy at law to redress the wrongs described  
herein. Plaintiff has been and will continue to be irreparably injured by the conduct of the defendants  
unless this court grants the declaratory and injunctive relief which plaintiff seeks.

50.) I William Harris Jr. have read the foregoing complaint and hereby verify that the matters alleged  
therein are true. I certify under penalty of perjury that the foregoing are true and correct.  
100 Warrior Lane  
Executed at this W.E. Donaldson Correctional Facility, Bessemer, Ala; 35023 on this 5th day of  
April 2011.

William Harris Jr. # 240945

William Harris Jr. # 240945

URGENT NOTICE

Exhibit 3  
A  
Copy of Jan 30th  
complaint into the  
Warden...

Mr. Warden Gary Hetzel  
January 30 2011.  
Inmate: E.F.G.H. 6-Block Seg. Housing Unit  
the H-side dormitory area

CV-11-AR-1646-M

Please MR. Warden Hetzel take notice of a life threatening situation that I inmate William H. Harris Jr. residing in your facility segregation unit. I have found myself to be placed with in, pertaining a attack of intentional and premeditated assault committed by another inmate Curtis Lynn, while being under the care and supervision of CO2 Reginald Rambo. prior to this assault committed just momentary I have been receiving threats from (3) Residing Officers that are currently employed here at this W.E. Donaldson Correctional Facility. As follows their Rank and names are Reginald Rambo, R. Gaston and Lorenzo Haywood. This unconstitutional behavior

Is the result of a adverse conspiracy directed towards my protected conduct in filing a civil claim against Officer Lorenzo Haywood in the May 12th 2010 Excessive Force incident. After this Officer MR. Lorenzo Haywood, was notified by and through the courts that he was currently being made a defendant in claim case NO. 2:10-CV-01333-IPJ-PWG. He immediately begin issuing death threat

By and through these two officers that works the seg unit where I am being housed in Officers Reginald Rambo, and R. Gaston. I have exhausted the chain of command pertaining a grievance against a ADX official. There have been no results. Now on this 30th day of January 2011 I just been attacked by a inmate whose wasn't suppose to have any contact with any one what so ever do to the Administration placement of No contact and walk alone status; yet this inmate was purposefully allowed out of the confines of his cell and hand cuffs to assault me by officer Reginald Rambo while I William Harris Jr. and other surrounding inmates was getting a criminal Hair cut

My prayers is that as Head case sec'ee of this facility that an immediate investigation to these allegations by checked into, to prevent any future "Harm" and the neglect of ensured safety by these person officials against me. Because these officers has vowed to have me attacked until demise. And I Humbly asks that you will please separate me away from these three officers Lorenzo Haywood, Reginald Rambo, and R. Gaston Thank Sir

Respectfully Submitted

Jan. 30th 2011.

William Harris Jr.



*Exhibits  
(B)  
copy of complaint  
from members of my  
church and family  
to every agency listed  
on last page of C.*

March 16, 2011

**Dear Sirs or To Whom It May Concern:**

We, the family of William H. Harris Jr, are **PLEADING FOR YOUR HELP!!** Very EASILY, William could be **your son or daughter!** Please READ this letter, and even if you can not help, would you at least forward it, to whom you think have it in their POWER TO HELP?

**We do not know where to turn to!** (EXCEPT GOD). We have done all that we know to do, and this is a last resort. **Will you please read this letter with your heart and take under consideration that William is somebody's son, he has a family and that he is loved, also.**

He and his three sisters, witnessed his father, **who is incarcerated in Holman prison, murder his mother, stabbing her to death.** This occurred when he was 14 years old. He is now 25 years old. From that time on, it seems that William has been in trouble. He never received the help that he needed after that kind of trauma in his life. We are not trying to excuse his behaviors. He has already been tried and convicted, and he is trying to do his time.

However, the things that are consistently happening in the prison, where he is incarcerated, **(DONALDSON)** while trying to do so, should not be occurring. **Please hear our hearts,** and at least investigate these allegations.

- **Enclosed you will find a handwritten, detailed account, of these allegations, written by William, himself. Also, enclosed is a statement, written by another inmate that was in William's housing unit, on that day.**
- **If nothing else, PLEASE READ THIS OTHER INMATES ACCOUNT OF WHAT HAPPENED. I BELIEVE THAT GOD WILL ALLOW YOU TO BE ABLE TO DISCERN THE TRUTH WHEN YOU READ IT.**

**On February 17, 2011,** we received a disturbing telephone call. **William H. Harris, #240945,** an inmate at Donaldson Correctional Facility, informed us that he had been physically assaulted by three (3) Donaldson Correctional Officers. The last names of the officers in question are **Rambo, Nate, and Gastson**. (please excuse us if the spelling of those names are incorrect).

According to William, the incident occurred around 7 a.m. on February 17, 2011, in his housing unit at Donaldson Correctional Facility. **This is what William alleges to have transpired:** He was being let out of his cell for morning exercises. (this is something he reports is done every morning). **He has been in SEG locked down, for nearly 5 straight years.** As per protocol, he was handcuffed before being let out of his cell. He reports that his handcuffs were double locked and that he was handcuffed with his hands behind his back. When his cell door was rolled, to let him out, the (3) above named officers, entered and commenced to beating him for approximately thirty minutes.

The beating took place in and outside of the cell. **He was maced and taken to the infirmary, again.** On the way there, he passed out and was revived. He awakened to feeling cold, running water over his body. While in the infirmary, he said that the officers planted a knife under his pillow. In addition, he stated that when he

attempted to report the incident to the supervisor in charge, he was told by *Sergeant Wheat* to “**Shut the fuck up! You got just what you deserve to get. That’s what you get for ‘fucking’ with my officers**”. (Please forgive our language, but we are just trying to report it as it was told to us).

We know that this may not seem plausible to you. However, this is NOT the first time that William has reported physical abuse, at the hands of Donaldson Correctional Officers. **As a matter of fact, William filed a 1983 Prisoner Civil Rights Complaint, in May 2010, against a Donaldson Correctional Officer, (Officer Haywood).** We, Williams’ family, called down to the prison, to ask “If they knew about what had transpired.” Also, if they could verify why that incident had not been written up or investigated.

At that time, several weeks had already passed and William had never even been questioned about the incident, received a disciplinary or a write up. When we called, we spoke to several men that identified themselves as Wardens. It is not like we, Williams’ family, had ever called down there before with allegations, complaints, or any type of harassment. This was our first time calling and we were only making inquiries. **Shockingly, they were all very rude and appeared to be extremely nonchalant and uncaring. They talked to us as if we were criminals.** Our family are Godfearing people, and would never talk ugly to anyone. We were simply begging for someone to investigate that incident, as we are now.

We even called the Commissioners’ office. There, a lady name **Janet Lejune**, we think, told us that she had **just received a letter from William, and that she would forward it on to the commissioner. She took our name and number and assured us that someone would call us back.** As of today, no one has ever called us back.

However, we assumed that someone must have investigated it, because nearly a month later, William was given a disciplinary. After that, William filed the law suit against Officer Haywood. **The lawsuit is still pending.** William reports that he has been approached **several times**, to drop the lawsuit. At least one of those times was by officer Haywood. He states that he was offered money, and promised to be let out of segregation, and be placed into population if he would drop the lawsuit. **William refused.**

William has reason to believe, as well as his family, that this recent assault and priors (some directly at the hand of DOC officials and others initiated by them), are the result of his civil complaint against Officer Haywood. **He has complained numerous times of harassment, at the hand of correctional officers.** After the lawsuit was filed, William was warned by an inmate to be very careful, because of what he had just overheard. True enough, just as the inmate had warned, it occurred.

He reported that Officer Haywood had **“PAID” another inmate to stab him.** This actually was tried. The handcuffs were (purposefully) not secured enough for either William nor the other inmate to remain restrained. William was sent to the infirmary to be treated, as a result of that incident. You will find all of this to be true, if you will just **PLEASE investigate it. We are afraid that if this behavior continues, that our loved one (Mr. Harris) will be seriously injured or killed.** Therefore, as concerned family members and concerned tax payers, we appeal to you and would like this matter investigated, please! It is imperative that this matter be given special attention and high priority.

William was sentenced to Life With Out Parole and thus does not have a release date. Since his re-incarceration in 2006, he has been housed in segregation. It is now 2011. **This in itself is not healthy, especially for someone who has such a documented history, as he does.** He has requested several times to be transferred to

another institution or to SIMPLY be taken out of segregation. Each time his request is denied. He has been told that he has enemies at each of the three (3) institutions that he is classified for (Holman, St. Clair, and Donaldson). He understands why he can not be transferred to Holman. His father, William H. Harris, Sr. is housed there. Mr. Harris, Sr. is **also sentenced to Life With out Parole. He was convicted of the Capital Murder of his wife, (William, Jr.'s mother).** However, he does not understand why St. Clair is not an option for his transfer.

Although we, as his family, would like for him to be transferred from Donaldson, or, at the very least, taken out of segregation (actually general population may not be safe for him given he has already accused an officer of "paying" another inmate to stab him). **After the most recent occurrence (March 2, 2011- which was reported to the shift commander on duty),** William stated that these same 3 officers, that had beaten him, has returned to his cell on several other occasions.

He was recently moved back to the housing unit where the alleged beating took place . According to William, he pleaded with the Lt. on duty as well as a Warden, that he not be returned to that housing unit. That unit is the permanent "duty location" of the officers who he alleges assaulted him and who are continuously harassing him. He fears that the officers will attack him again, if given the opportunity. **(especially since it seems as if no one is going to correct their behavior).** He recently had a Dentist appointment, but refused to go to keep his appointment, because it was these SAME officers that came to escort him.

Also, he refused to go get a hair cut because of the same thing. He says that he does not want to give them any reason to enter his cell and further abuse him. Also, William says that he, as well as **a superior officer there, requested that William not be returned to that particular unit where these 3 officers are.** This superior officer felt that for William to remain in that same unit, it would be a definite threat to William's life. According to William, the **Warden replied that he was aware of his concern and saw "no reason to believe that his life was in danger".**

Our primary focus, at this point, is **to ensure that he is kept ALIVE and is treated fairly according to ADOC policy and federal law.** This is why we are trying to alert everyone that we can about this, now! We do not wish for William to just show up as "another casualty" that is covered up or that no one can validate. We do believe that an ounce of Prevention is worth a Pound of Cure.

Innocent or guilty of a crime, no one should be treated inhumane. William has been sentenced. Please allow him to just do his time without undue hardships. **Only God can render true JUSTICE. We never pray for William, without praying for the Victims, Families of Victims, other Inmates, Wardens, Commissioners, Officers, Chaplains, and all DOC affiliates.**

**We pray for Grace, Mercy, Help, Peace, Forgiveness, Non-Violence, Rehabilitation and Most of ALL, TRUE SALVATION for all.** Only God can truly see a man's heart. Only God is qualified to truly be a JUST JUDGE. We implore you to allow God to be the Dictator of William's future. We know that God uses people down here to do HIS will. Our question is, "As you read this letter, will you be one to allow God to use you on William's behalf?"

**Desperate but Heartfelt Cries,  
William's FAMILY**

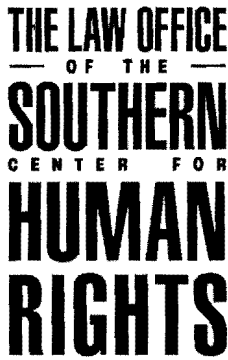
**Spokesperson for our family: Mrs. LaShunna Harris Mc Williams**

**Address: P. O. Box 28606 Birmingham, Al 35228**

**Phone: (205) 383-9647**

**E-mail: [kingdom.minded15@yahoo.com](mailto:kingdom.minded15@yahoo.com)**

**cc: President of the United States of America, Governor of Alabama, Alabama Department of Correction Commissioner, Lt.Governor of Alabama, Alabama Attorney General, Alabama DOC Central Records, William E. Donaldson Correctional Facility's Wardens, Southern Poverty Law Center, Southern Center for Human Rights, SCLC, and NAACP.**



83 Poplar Street, NW  
Atlanta, GA 30303  
P. (404)688-1202  
F. (404)688-9440  
[www.schr.org](http://www.schr.org)

Sara J. Totonchi  
*Executive Director*

Stephen B. Bright  
*President and Senior Counsel*

Charles J. Ogletree  
*Harvard Law School  
Chair, Board of Directors*

**PRIVILEGED: ATTORNEY-CLIENT COMMUNICATION**

March 31, 2011

Mr. William H. Harris, Jr.  
AIS # 240945  
Donaldson Correctional Facility  
100 Warrior Lane  
Bessemer, AL 35023

Dear Mr. Harris:

Thank you for the motion that you sent to us. We also recently received a letter from your family pertaining to the incident that you described in your motion. I am sorry to hear about what occurred.

As you may know, we represent three men at Donaldson who have sued the Alabama Department of Corrections regarding the conditions at Donaldson Correctional Facility. One of the allegations made in the complaint is that officials at Donaldson have tolerated a policy and practice of excessive force on prisoners, and that the Department has failed to adequately investigate past incidents of excessive force. We are currently awaiting a ruling from the judge in our case as to whether the lawsuit will go forward.

In the meantime, I am enclosing an assault report form. We would be grateful if you could take a moment to fill it out and send it back to us. Please also let us know whether you would like us to report this incident to the attorneys for the ADOC.

Thank you in advance and feel free to write back with any questions or concerns. We appreciate you reporting this incident to us.

Sincerely,

Sarah Geraghty  
Attorney

*Exhibit C*  
*Copy of reply, under plaintiff's complaint.*



**HUMAN RIGHTS WATCH**

1630 Connecticut Avenue, N.W.  
 Suite 500  
 Washington, DC 20009  
 Tel: 202-612-4321  
 Fax: 202-612-4333  
 Email: hrwdc@hrw.org

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 Jamie Fellner, *Senior Counsel*  
 Antonio Ghatta, *Advocacy Director*  
 Sarah Mehta, *Aryeh Neier Fellow*  
 Grace Meng, *Researcher*  
 Chloe Nicolaisen, *Associate*  
 Alison Parker, *Director*  
 Vikram Shah, *Associate*  
 Elena Vanko, *Associate*

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 Dinah PoKempner, *General Counsel*  
 James Ross, *Legal & Policy Director*  
 Joe Saunders, *Deputy Program Director*  
 James F. Hoge, Jr., *Chair*

Dear Friend,

Thank you for your recent letter to Human Rights Watch. I write to inform you that unfortunately, staffing constraints have forced us to cease reading and responding to correspondence from persons in state or federal custody. We understand that the information you have shared with us is important and that your grievance deserves serious consideration and attention, but due to budgetary cutbacks resulting from the current economic crisis, we are no longer able to be of assistance.

The experiences of individuals in US prisons, jails, and federal detention facilities remain of great concern to Human Rights Watch, and we will occasionally request correspondence that is pertinent to a specific issue in which we are conducting research, but for the time being we ask that you seek help from other organizations. Advocating for compassionate care of persons in custody, in compliance with international legal standards, remains one of the central priorities of the US Program at Human Rights Watch, and please be assured that we are in no way ending that important work.

Again, thank you for sharing your story with us. We regret that we are unable to help, and we hope that you will pursue other avenues in seeking assistance with your situation. We have recently compiled an extensive list of resources and organizations that may be able to better assist you. It is available online at <http://www.hrw.org/en/prison-resources>.

To obtain more information regarding resources in your state, as well as referrals to other organizations which may assist you directly, please contact:

American Civil Liberties Union (ACLU) of Alabama  
 207 Montgomery Street, Suite 910  
 Montgomery, AL 36104  
 By phone: (334) 262-0304  
 By fax: (334) 269-5666  
 Website: <http://www.aclualabama.org/GetHelp/GetHelp.htm>

Note: For legal assistance address to "Legal Committee"

Thank you,

*Elena Vanko*

Elena Vanko

HUMAN  
 RIGHTS  
 WATCH

[www.hrw.org](http://www.hrw.org)



Copy of  
witness statement  
in the Motion &  
Indictment & Plea  
Agreement

## DECLARATION

Exhibits  
E

I Brandon Steele AIS #253937 on this 2nd day of March 2011, did in fact witness (7) different officers approach the top tier of V-W seg. Housing unit to perform a riot squad cell search. Two of those officers stopped at my cell Both unknown while the other (6) stopped at inmate William Harris cell out of the CSC that stopped at W-43 W. Harris Cell. I saw among them a per. officer L. Haywood, G. Gaston, R. Rambo, and the other (two) remains unknown. I ~~Brandon Steele~~ Brandon Steele AIS #253937 was ordered to come out my cell and stand on the tier from my given location I over heard officer R. Rambo, tell inmate W. Harris, to get rolled and approach his cell door. As the officer cuffed inmate W. Harris And got his cell door open, from there four out of the five officers standing there entered inmate W. Harris cell, officers R. Rambo, G. Gaston and ~~two~~ unknown officers, while officer L. Haywood stood on the top tier a couple feet down from me staring in inmate Harris cell room. I couldn't see that much, but I heard inmate W. Harris pleading for the officer or officers to stop hitting him. In between pleads coming inmate Harris, I heard a officer yell Bitch you still wanna pursue this civil suit. From there a another officer caught me trying to peek further into the cell, and threaten that if I don't look straight forward and mine my business that I would be the next one in line to get my ass kicked. I Brandon Steele swear and declare under penalty of perjury that the foregoing is true and correct. Executed at this W.F. Donaldson core. on this 2nd day of March 2011.

Brandon Steele 253937

Copy of witness  
statement of the  
Feb. 17th 2011 incident  
of plaintiff's claim.

Exhibits  
C, F,  
//

## DECLARATION

MY NAME IS STEVE LEDLOW, AND I AM PRESENTLY  
HOUSED AT THE ALABAMA DEPARTMENT OF CORRECTIONS -  
WILLIAM E. DONALDSON CORRECTION FACILITY, BESSEMER. AM  
I AM OVER THE AGE OF 21 YEARS.

STATEMENT: ON 2/17/11 AT ABOUT 6:45 AM I, Steve Ledlow, WAS  
HOUSED IN H-BLOCK-6 CELL-SEG. UNIT WHEN I WITNESSED  
INMATE WILLIAM HARRIS TUMBLE-ING DOWN ATLEAST 15  
STAIR-STEPS WHILE HE WAS IN ~~RESTRAINTS~~ RESTRAINTS -  
INMATE HARRIS APPEARED TO BE GASPING FOR AIR WHEN  
OFFICER RAMBO STOOD HARRIS UP TO HIS FEET AND REPEATED-  
LY PUNCHED INMATE HARRIS IN THE FACE AND HEAD, -  
OFFICER RAMBO STATED WITH EVERY PUNCH: "NOW THIS IS  
WHAT I CARE ABOUT YOU!"

I DECLARE UNDER PENALTY OF PERJURY THAT THE  
FOREGOING IS TRUE AND CORRECT. EXECUTED AT BESSEMER,  
ALABAMA ON THE 2 DAY OF 17<sup>th</sup> 2011.

  
SIGNATURE

Kate & Officer Sixtump did do something. They needed  
 us all over to the other side of the shower down stairs so  
 we couldn't observe the beating taking place in the cell. We  
 didn't do any good because the officers Rambo &  
 Geston having the beating out of the cell into our full view  
 live & in the room. Now this is what I seen with my own  
 eyes, and I'm willing to place myself under oath that this  
 is nothing but the truth, the whole truth so help me God.  
 Officers Rambo & Geston stomped the handcuffed inmate  
 Willie Harris all the way out of his cell. With him (inmate  
 Harris) laid out bloody on the top tier on his side. Officer  
 Rambo then pause for a brief moment to radio in that  
 he needed a supervisor in 6 block. Then immediately after  
 that he took his right foot and stomped down on inmate  
 Harris head then yelled down at him, "talk that shit no  
 bitch!!" Officer Rambo continue to yell with each kick  
 & stomp to inmate Harris' body. Which I counted to be  
 approximately three stomps and a kick. Then officers Geston  
 reached down & pulled inmate Harris to his feet and began  
 to give inmate Harris a series of body blows. And together  
 Officer Rambo & Geston continued to punch on inmate Harris  
 all the way to the staircase. With Officer Rambo yell-  
 ing over & over, "talk that shit now f--- guy. Talk that shit  
 now!!" And at the head of the steps Officer Rambo tried  
 to toss inmate Harris down the stairs. But some say in-  
 mate Harris only managed to stumble down half of them  
 which seemed to only piss Officer Rambo off even more.  
 He (Officer Rambo) then took his foot and kicked inmate Harris  
 multiple times until he was completely down the stairs.

point the assault clearly ~~continued~~ continued to take place right in front of numerous inmates who were all standing in the day space over to the right side of the main exit door. From here we witness inmate Harris being snatched up by his handcuffs by Officer Rambo, then spun around in a complete circle + toss back to the ground. Once inmate Harris hit the ground once again, Officer Rambo took a running start then took his right foot and tried to kick inmate Harris in the head. But only manage to graze him on the side of his head. Then Officer Gaston tried to copy Rambo every move from the point where he picked Harris up and spun him around. But this time inmate Harris stayed on his feet and stumbled out of the block with Officer Rambo still taking pot shots at him. From this point I could only hear the tussling + beating still taking place in the corridor.

Written Statement From: Sakking Burke  
 #247602  
 Sakking Burke

Notary Public

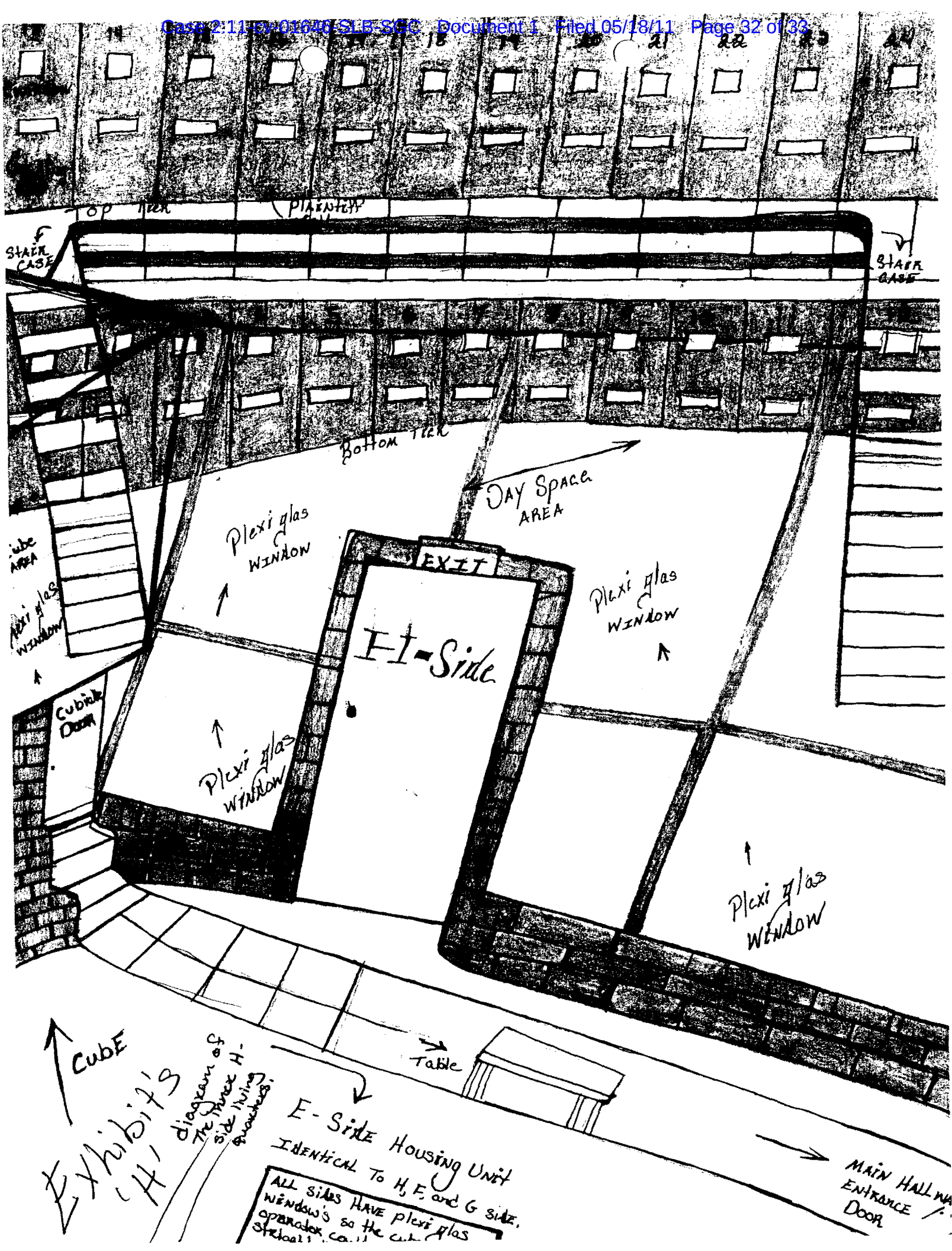
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Affidavit.

Exhibits  
V. G. ///Written on February 1,  
2011 at 9:00 am. By: Sak'ing  
Burke #247602Copy of witness  
statement is the  
incident of Plaintiff's  
claim 247602.

On February 17<sup>th</sup>, 2011, Thursday morning. I Sak'ing Burke inmate #247602 over heard the officers Rambo + Officer Gaston physically beat inmate Willie Harris in cell H-16 for about 2 or 3 minutes straight. I'm able to hear the beating clearly because it was in the cell directly over my head (I'm in H-4). And from speaking to his next door neighbor + others from upstairs who also came out of the cell to walk that morning, which happens to be the time that this took place. ~~That~~ Inmate Willie Harris was indeed in handcuff. Now this all occurred over an incident ~~that~~ from yesterday (Wednesday) where inmate Harris + Officer Rambo had exchanged words in a verbal argument after the Seg. Book came through. Which in my book wasn't a good enough reason for two officers both standing over 6 feet tall enweighing in over 200 + pounds apiece, to physically assault a man who is 5'9" ~~about~~ 168<sup>lbs</sup>, and on top of that he's in handcuffs! There was two other officers on the floor in the block while this was all going on + a officer watching from the cube. Officers Nate + Sixtrump were down stairs + Officer Mo'king was in the cube. I'm bringing these officers names up because they all witness this going down + neglected there job to serve + most importantly to protect inmate Willie Harris from harm. By doing nothing to stop this brutish assault from going down. I mean they could have called a code or something, but they did nothing and continued on placing us in cuffs + letting us out of our cells to ~~man walk~~ I took that back off.





Exhibits  
(A)

Date: February 17th 2011.

Date: February 17th 2014  
Placement: E, F, G, H, 6-Block seg. Housing Unit  
on the H-side Dormitory area.

Today these (two) officers Reginald Rambo and R. Gaston, got the cubicle operator Ms. Veronica King, to roll my cell door, while they violated me and my rights, by committing an act of deliberate indifference, then the form of guard brutality. Officers COZ Nade and Citron, both was inside the H-side dormitory area, still cuffing other inmates up to be allowed out of their cell to walk, neither one of these officers COZ Nade or Citron did nothing to intervene between both the premeditated assault nor the violations of the U.S. Constitutional Rights. I Humbly asks that someone, anybody, would Review the nature of this act, and execute a impartial order of judgement, to ensure my safety just as well as many others. I am tired of being abused, all I asks for is for Justice to be executed and upheld.

Respectfully Submitted  
William Harris Jr

Feb. 17th 2011.  
Date