

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF WASHINGTON

Michael Denton, Joseph Simmons, Adam Lawrey, Muhammad ALI, ISSIAH KALBEU, MEL Ford, Warren, James Mosley, Michael Roberts, Joseph Russell, Ron Dopkin, Kyle Payment, Samuel McFarland.

Plaintiff

vs.

TIM THRASHER, Karie Kauer, MHP Lindsey McIntire, MHP Dan Snewisser, MHP Kevin Goodenough, Dan Hel Knock, Scott Kothick, Steve Simlaire, WSP Officer Schalls, LT Sheldon Moore, MHP Jaime Davis, WSP William Fletcher, Steve Hammond, Robert Herzog, Chuck Pease, David McKinie.

Defendant(s)

Case Number: C18-5017BHS/DWC

DECLARATION AND APPLICATION TO PROCEED IN FORMA PAUPERIS AND WRITTEN CONSENT FOR PAYMENT OF COSTS BY A PRISONER BRINGING A CIVIL ACTION

DO NOT use this form if you are bringing a Petition for Writ of Habeas Corpus.

DECLARATION AND APPLICATION TO PROCEED IN FORMA PAUPERIS

I (print your name) Michael Denton. declare I am the plaintiff in this case; I believe I am entitled to relief; and I am unable to pay the costs of this proceeding or give security thereof. The nature of my action is briefly stated as follows: I am an indigent prisoner who do not have the funds/money to pay the \$350 filing fee for this class action suit.

In support of this application, I answer all of the following questions:

1. Are you currently incarcerated?

[X] Yes If "Yes" state the place of your incarceration Washington State Penitentiary.

You must also attach a certified copy of your prison trust account statement showing transactions for the past six months.

[ ] No If "No" do not use this form.

2. Are you presently employed? [ ] Yes Employer \_\_\_\_\_ Salary \_\_\_\_\_ [X] No

3. For the past twelve months, list the amount of money you have received from any of the following sources.

- a. Business, profession or other self-employment \$ \_\_\_\_\_
b. Income from rent, interest or dividends \$ \_\_\_\_\_
c. Pensions, annuities or life insurance payments \$ \_\_\_\_\_
d. Disability, unemployment, workers compensation or public assistance \$ \_\_\_\_\_
e. Gifts or inheritances \$ \_\_\_\_\_
f. Money received from child support or alimony \$ \_\_\_\_\_
g. Describe any other source of income \$ \_\_\_\_\_

4. List the amount for each of the following (include prison account funds):

Cash on hand \$ \_\_\_\_\_ Checking Account \$ \_\_\_\_\_ Savings Account \$ \_\_\_\_\_

5. Do you own or have any interest in any real estate, stocks, bonds, notes, retirement plans, automobiles, or other valuable property (excluding ordinary household furnishings and clothing)?

If Yes, describe the property and state its approximate value:

Yes \_\_\_\_\_ \$ \_\_\_\_\_  
 No \_\_\_\_\_ \$ \_\_\_\_\_

6. Are any persons dependent upon you for support? If Yes, state their relationship to you, and indicate how much you contribute toward their support each month. (Do not include names of minor children.)

Yes \_\_\_\_\_ \$ \_\_\_\_\_  
 No \_\_\_\_\_ \$ \_\_\_\_\_

7. Describe the types of monthly expenses you incur, such as housing, transportation, utilities, loan payments, or other regular monthly expenses and the amount spent each month.

\_\_\_\_\_ \$ \_\_\_\_\_

8. Provide any other information that will help explain why you cannot pay court fees and costs.

BECAUSE I do not have A Job and I am Indigent and cannot pay court fees and cost due to Being unemployed and Indigent with 0 funds.

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

1-3-2018 *Michael Denton*  
Executed on: (Date) Signature of Applicant

**WRITTEN CONSENT FOR PAYMENT OF COSTS UNDER LOCAL RULE CR3(b)**

I (print your name) Michael Denton  
hereby consent that any recovery in damages that I may receive in the above-captioned cause may be reduced, if so directed by the court, in such an amount as is necessary for payment of the unpaid fees and costs which are taxed against me in the course of this litigation.

1-3-18 *Michael Denton*  
Executed on: (Date) Signature of Applicant

### ACKNOWLEDGMENT AND AUTHORIZATION

Case Number \_\_\_\_\_

By choosing to bring a civil action, I acknowledge I am responsible for payment of the full \$350.00 filing fee under 28 U.S.C. § 1915. I authorize the agency having custody of me to collect from my account and forward to the Clerk of the United States District Court the initial partial filing fee calculated under the Certification and Calculation section and payments pursuant to 28 U.S.C. § 1915(b).

I understand I am required to make monthly payments of twenty (20) percent of my preceding month's income credited to my account and the agency having custody of me will forward funds to the Clerk of the United States District Court each time the amount in the account exceeds ten (\$10.00) dollars until the filing fee is paid in full.

1-3-2018  
Date

Michael Denten  
Signature of Applicant

Michael Denten  
Committed Name of Applicant

898410  
Inmate Number

10/16/2017 10:16

Department of Corrections

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WASHINGTON STATE PENITENTIARY

OTRTASTB

TRUST ACCOUNT STATEMENT

6.03.1.0.1.9

DOC# 0000898610 Name: DENTON, MICHAEL DESHAWN  
 LOCATION: E04-207-MSF01

BKG# 306060

Account Balance Today ( 10/16/2017 ) Current : 2.60  
 Hold :  
 Total : 2.60

Account Balance as of 10/15/2017 2.60  
 09/15/2017 10/15/2017

SUB ACCOUNT	START BALANCE	END BALANCE
SPENDABLE BAL	0.00	0.00
WORK RELEASE SAVINGS	0.00	0.00
POSTAGE ACCOUNT	0.00	0.00
COMM SERV REV FUND ACCOUNT	0.00	0.00
SAVINGS BALANCE	0.00	2.60
MEDICAL ACCOUNT	0.00	0.00
EDUCATION ACCOUNT	0.00	0.00

DEBTS AND OBLIGATIONS

TYPE	PAYABLE	INFO NUMBER	AMOUNT OWING	AMOUNT PAID	WRITE OFF AMT.
COIS	COST OF INCARCERATION /07112000	09212006	UNLIMITED	15.27	0.00
MHD	MENTAL HEALTH COPAY DEBT	06282012	20.00	0.00	0.00
OTCD	OVER THE COUNTER MEDS DEBT	08252017	4.12	0.00	0.00
SPOSD	SAPOS POSTAGE DEBT	09062016	15.90	2.65	0.00
SPOSD	SAPOS POSTAGE DEBT	04232015	10.70	5.40	0.00
POSD	POSTAGE DEBT	10022006	59.36	0.00	0.00
SPOSD	SAPOS POSTAGE DEBT	10022017	5.50	0.00	0.00
COPD	COPY COSTS DEBT	05142012	17.20	0.00	0.00
HYGA	INMATE STORE DEBT	04192007	194.49	36.95	0.00
TVD	TV CABLE FEE DEBT	09082007	3.49	0.00	0.00
LFO	LEGAL FINANCIAL OBLIGATIONS	20061006	UNLIMITED	21.27	0.00
LMD	LEGAL MAIL DEBT - SPENDABLE SUBACCT	02272012	7.79	0.00	0.00
MEDD	MEDICAL COPAY DEBT	04132010	27.00	0.00	0.00
HYGA	INMATE STORE DEBT	08202010	11.44	2.40	0.00
OTCD	OVER THE COUNTER MEDS DEBT	10242016	4.12	0.00	0.00
TVD	TV CABLE FEE DEBT	05122007	4.00	5.15	0.00
COI	COST OF INCARCERATION	09212006	UNLIMITED	0.00	0.00
MISCD	MISCELLANEOUS DEBT	08312010	1.69	0.00	0.00
LMD	LEGAL MAIL DEBT - SPENDABLE SUBACCT	04202007	10.84	1.26	0.00
POSD	POSTAGE DEBT	01182007	50.61	0.00	0.00
IDTD	ID TAG DEBT	02012012	3.00	0.00	0.00
TIPND	TELEPHONE IPIN DEBT	09202017	3.00	0.00	0.00

23.05100

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WASHINGTON STATE PENITENTIARY

OTRTASTB

TRUST ACCOUNT STATEMENT

6.03.1.0.1.9

DOC# 0000898610 Name: DENTON, MICHAEL DESHAWN

BKG# 306060

LOCATION: E04-207-MSF01

DEBTS AND OBLIGATIONS

TYPE	PAYABLE	INFO NUMBER	AMOUNT OWING	AMOUNT PAID	WRITE OFF AMT.
TIPND	TELEPHONE IPIN DEBT	10212016	3.00	0.00	0.00
COPD	COPY COSTS DEBT	04202007	11.00	1.00	0.00
HYGA	INMATE STORE DEBT	01222007	36.11	26.66	0.00
COPD	COPY COSTS DEBT	09252007	68.84	0.00	0.00
SPHD	STORES PERSONAL HYGIENE DEBT	08212007	17.80	0.00	0.00
HYGA	INMATE STORE DEBT	09262006	234.89	35.76	25.00
MHD	MENTAL HEALTH COPAY DEBT	03222013	49.22	4.00	0.00
MISCD	MISCELLANEOUS DEBT	10022006	17.62	0.00	0.00
EL	ESCORTED LEAVE	09-2011	UNLIMITED	0.00	0.00
MEDD	MEDICAL COPAY DEBT	03272007	19.00	0.00	0.00
POSD	POSTAGE DEBT	11172010	2.20	0.00	0.00
SPHD	STORES PERSONAL HYGIENE DEBT	01182007	83.75	0.00	0.00
COPD	COPY COSTS DEBT	06262013	9.20	0.00	0.00
MEDD	MEDICAL COPAY DEBT	10182006	24.44	14.56	0.00
CVC	CRIME VICTIM COMPENSATION	09212006	UNLIMITED	1.55	0.00
TVD	TV CABLE FEE DEBT	01132007	11.50	0.00	0.00
LMD	LEGAL MAIL DEBT - SPENDABLE SUBACCT	09302016	13.14	0.00	0.00
SPOSD	SAPOS POSTAGE DEBT	04192013	15.75	13.60	0.00
DEND	DENTAL COPAY DEBT	05252012	7.00	0.00	0.00
DPSD	RESTITUTION DEBT	06272017	0.00	0.00	0.00
POSD	POSTAGE DEBT	05212007	18.11	0.00	0.00
COSXD	COST OF SUPERVISION DEBT	11132012	598.56	1.44	0.00
HYGA	INMATE STORE DEBT	08292007	71.40	1.66	0.00
CVCS	CRIME VICTIM COMPENSATION/07112000	09212006	UNLIMITED	4.12	0.00
TVD	TV CABLE FEE DEBT	09112010	1.50	0.00	0.00
MHD	MENTAL HEALTH COPAY DEBT	11262012	8.00	0.00	0.00

TRANSACTION DESCRIPTIONS --

SPENDABLE BAL SUB-ACCOUNT

DATE	TRANSACTION DESCRIPTION	RECEIPT#	TRANSACTION AMT	BALANCE
09/26/2017	INTERFACE-I03		0.00	0.00
10/02/2017	Transfer In Reg, Sav, Ed, Med from AD1		0.00	0.00
10/02/2017	INMATE STORE DEBT (AUTO)		2.35	2.35
10/02/2017	CRS SAL ORD #9609106		( 2.35)	0.00
10/04/2017	PERSONAL HYGIENE DEBT (MANUAL)		2.20	2.20
10/04/2017	PERSONAL HYGIENE (MANUAL)		( 2.20)	0.00
10/09/2017	INMATE STORE DEBT (AUTO)		2.75	2.75
10/09/2017	CRS SAL ORD #9620078		( 2.75)	0.00

24.09100

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WASHINGTON STATE PENITENTIARY

OTRTASTB

TRUST ACCOUNT STATEMENT

6.03.1.0.1.9

DOC# 0000898610 Name: DENTON, MICHAEL DESHAWN  
 LOCATION: E04-207-MSF01

BKG# 306060

TRANSACTION DESCRIPTIONS --

WORK RELEASE SUB-ACCOUNT  
SAVINGS

DATE	TRANSACTION DESCRIPTION	RECEIPT#	TRANSACTION AMT	BALANCE
10/02/2017	Transfer In Reg, Sav, Ed, Med from AD1		0.00	0.00

TRANSACTION DESCRIPTIONS --

POSTAGE ACCOUNT SUB-ACCOUNT

DATE	TRANSACTION DESCRIPTION	RECEIPT#	TRANSACTION AMT	BALANCE
10/02/2017	Transfer In Reg, Sav, Ed, Med from AD1		0.00	0.00
10/02/2017	SAPOS POSTAGE DEBT		2.75	2.75
10/02/2017	SAPOS SAL ORD #9609103		( 2.75)	0.00
10/09/2017	SAPOS POSTAGE DEBT		2.75	2.75
10/09/2017	SAPOS SAL ORD #9620076		( 2.75)	0.00

TRANSACTION DESCRIPTIONS --

COMM SERV REV SUB-ACCOUNT  
FUND ACCOUNT

DATE	TRANSACTION DESCRIPTION	RECEIPT#	TRANSACTION AMT	BALANCE
10/02/2017	Transfer In Reg, Sav, Ed, Med from AD1		0.00	0.00

TRANSACTION DESCRIPTIONS --

SAVINGS BALANCE SUB-ACCOUNT

DATE	TRANSACTION DESCRIPTION	RECEIPT#	TRANSACTION AMT	BALANCE
10/02/2017	Transfer In Reg, Sav, Ed, Med from AD1		2.60	2.60

TRANSACTION DESCRIPTIONS --

MEDICAL ACCOUNT SUB-ACCOUNT

DATE	TRANSACTION DESCRIPTION	RECEIPT#	TRANSACTION AMT	BALANCE
10/02/2017	Transfer In Reg, Sav, Ed, Med from AD1		0.00	0.00

TRANSACTION DESCRIPTIONS --

EDUCATION ACCOUNT SUB-ACCOUNT

DATE	TRANSACTION DESCRIPTION	RECEIPT#	TRANSACTION AMT	BALANCE
10/02/2017	Transfer In Reg, Sav, Ed, Med from AD1		0.00	0.00

25.06100

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

Michael Denton, Joseph Simmons, Adam  
Lowery, Muhammad ALI, ISSIAH  
KALBEU, MELford WARREN, JAMES  
MOSLEY, Michael Roberts, Joseph  
Russell, Ron Bopkin, KYLE PAYMENT, SAMUEL McFarland  
(Name of Plaintiff)

C18-5017BHS/DWC

✳ CLASS ACTION ✳  
CIVIL RIGHTS COMPLAINT  
BY A PRISONER UNDER 42  
U.S.C. § 1983

vs.

Tim Thrasher, Dr. KARIE RAINER, MHP Lindsey  
McIntyre, MHP Dr. DAN SNEWISSER, MHP KEVIN  
Gooderough, DAN HOLBROOK, Scott Buttice, STEVE  
SINCLAIRE, WSP Officer Schollis, WSP LT MOORE, MHP Jaime DAVIS,  
WSP SGT. Fletcher, Steve Hammond, Robert Herzog, Chuck Pease, LT. MILLER.  
Counselor David McKinnie (Names of Defendant(s))

I. Previous Lawsuits:

A. Have you brought any other lawsuits in any federal court in the United States while a prisoner?:

Yes       No

B. If your answer to A is yes, how many?: 2. Describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff: Michael Denton, Pruse

Defendants: paul pastor, Charla James Hepburn, Mark IN SPENCER  
Jackie Caruso

2. Court (give name of District): Western District

3. Docket Number: 3:16-cv-05314-RJB-DWC

4. Name of judge to whom case was assigned: Robert J. Bryan and David W. Christel

5. Disposition (For example: Was the case dismissed as frivolous or for failure to state a claim? Was it appealed? Is it still pending?):

Still pending awaiting Trial

6. Approximate date of filing lawsuit: 4-28-2016

7. Approximate date of disposition: N/A

II. Place of Present Confinement: Washington state Penitentiary

A. Is there a prisoner grievance procedure available at this institution?  Yes  No

B. Have you filed any grievances concerning the facts relating to this complaint?  Yes  No

If your answer is NO, explain why not:

\_\_\_\_\_

C. Is the grievance process completed?  Yes  No

If your answer is YES, ATTACH A COPY OF THE FINAL GRIEVANCE RESOLUTION for any grievance concerning facts relating to this case.

III. Parties to this Complaint

A. Name of Plaintiff: Michael Denton and Class. Inmate No.: 898610

Address: 1313 N. 13th AVE. WALLA WALLA WA, 99362

(In Item B below, place the full name of the defendant, his/her official position, and his/her place of employment. Use item C for the names, positions and places of employment of any additional defendants. Attach additional sheets if necessary.)

B. Defendant: Tim Thrasher Official Position: Mission Housing Administrator

Place of employment: Washington state Department of Corrections.

C. Additional defendants Tim Thrasher, Dr Karie Rainer, MHP Lindsey McIntyre, MHP Dr. Dan Snewisser, MHP Kevin Goodenough, Dan Holbrook, Scott Buttice, Steve Sinclair, WSP Officer Scholls, WSP LT. Moore, WSP LT. Miller, WSP SGT. Fletcher, Steve Hammond, Robert Herzog.



(State here as briefly as possible the facts of your case. Describe how each defendant is involved, including dates, places, and other persons involved. Do not give any legal arguments or cite any cases or statutes. IF YOU ALLEGE A NUMBER OF RELATED CLAIMS, NUMBER AND SET FORTH EACH CLAIM IN A SEPARATE PARAGRAPH. ATTACH ADDITIONAL SHEETS IF NECESSARY.)

## CLAIM I.

The defendants, Tim Thrasher, Dr. KARLE RAINER, Dan Holbrook, Steve Hammond, Robert HERZOG, STEVE SINCLAIRE, MHP LINDSEY MCINTYRE, MHP KEVIN GOODENOUGH, DR. DAN SNEWISSER, CUNSLOR DAVID MCKINNIE, CUS SCOTT BUTTICE, did ACT with Deliberate Indifference to the rights of plaintiff Michael Denton and ALL CLASS MEMBERS of this suit mentioned as plaintiff's in this civil suit by: ILLEGALLY housing plaintiff Michael Denton, Joseph Simmons, Adam Lowery, Muhammad ALI, ISSIAH KALBEU, MELFORD WARREN, JAMES MCKEY, MICHAEL ROBERTS, JOSEPH RUSSELL, Ron Kopping, KYLE PAYMENT and SAMUEL MCFARLAND in Administrative Segregation / Solitary Confinement for long periods of time which ONLY EXACERBATE their CURRENT MENTAL ILLNESS. AND CAUSES them to DETERIORATE MENTALLY which this ISOLATION causes them to FEEL suicidal and Depressed to the point where the class members start to commit SELF HARM and continue to try to HARM THEM SELF OR KILL THEM SELF; failure to provide adequate mental health treatment to plaintiff Michael Denton and all class members in this suit being ILLEGALLY housed in Administrative Segregation caused ALL class members (plaintiff's) to become trapped in the disciplinary process and end up in isolated confinement settings in the Administrative Segregation for years at a time and causes them to deteriorate Psychiatrically, which the Defendants: Tim Thrasher, Dr. KARLE RAINER, Dan Holbrook, Steve Hammond, Robert HERZOG, STEVE SINCLAIRE, MHP LINDSEY MCINTYRE, MHP KEVIN GOODENOUGH, SCOTT BUTTICE, Dr. DAN SNEWISSER and Cunslor David McKinnie continues to house mentally ill inmates in Administrative Segregation instead of sending them to a mental health treatment facility to treat their mental illnesses, do to the Washington State Department of Corrections only has 1 treatment facility at MCC Monroe corrections SOU Special Offender Unit for mentally ill inmates and by not building more than one treatment facility for inmates, plaintiff Michael Denton and ALL CLASS MEMBERS (plaintiff's) in this civil suit ARE being ILLEGALLY housed in Administrative Segregation which is not a treatment center or facility for treating inmates who ARE suffering from SERIOUS mental illnesses, which the defendants: Tim Thrasher, Dr. KARLE RAINER, Dan Holbrook, Steve Hammond, Steve Sinclair and Robert HERZOG created a policy which they all enforced to house mentally ill inmates in Administrative Segregation, SHU, Keep Lock, OR.

Primitive Segregation, which is the effects of solitary confinement, PTSD, Borderline personality disorders and Antisocial disorders, which the defendants have been having plaintiff Michael Denton and all members of this class action suit who are named plaintiff to this class in Solitary Confinement for years which plaintiff Michael Denton and other class members of this suit such as Adam Lawrey and ISSAIAH Kalbeu is on the restraint bed right now due to they are deteriorating and continue to harm themselves which plaintiff Denton has spent long periods of time on the restraint bed also so has plaintiff Joseph Simmons and all other class members in this suit who are trapped in the disciplinary process in Solitary confinement against their will and being persisted due to the fact that all the class members who are named plaintiff in this suit is suffering from serious mental illnesses and can't control their impulses due to inadequate treatment of mentally ill inmates in this suit which the defendants all knew that plaintiff Michael Denton is suffering from the effects of Solitary confinement, which per plaintiff Denton Diminished Capacity Evaluation on 3-26-2017 by doctor Anthony Eusanio pg 34-37 (Attached as exhibit A) doctor Anthony Eusanio states plaintiff Denton is suffering from the effects of Solitary confinement which causes plaintiff Denton to deteriorate psychiatrically and caused plaintiff Denton to be trapped in the disciplinary process in the persons solitary confinement settings, which even after all the aboved named defendants was served with the notification Petition with a copy of plaintiff Denton Diminished Capacity Evaluation By Doctor Anthony Eusanio on 3-26-2017 which Dr Dan SNEWISSE, MHP Lindsay MCINTIRE, who was plaintiff Denton mental health counselor, Captain MCNEESE, Tim Thrasher, Korie Rainer, Lisa Anderson, Counselor Todd Saunders Kevin Goodenough, Scott Buttice, Counselor David McKinnie, all still refused to release plaintiff Denton from Administrative Segregation. Even after Tim Thrasher was notified by plaintiff Denton Snohomish County Social worker ERIC Jonsin by Email and Fax sent to Tim Thrasher notifying him that plaintiff Denton is suffering from the effects of Solitary confinement and long term Isolation which is making plaintiff Denton deteriorate psychiatrically which social worker ERIC Jonsin faxed plaintiff Denton Diminished Capacity Evaluation TO Tim Thrasher advising him to release plaintiff Denton from segregation which is causing plaintiff harm to himself and others, "(SEE EMAIL sent to Tim Thrasher on Monday July 17, 2017 10:47 am with psychological evaluation attached as exhibit B)" which all the aboved named defendants still refused to release plaintiff from Segregation and

Transfer Plaintiff to SOU special offender unit at MCC Monroe Correctional Complex in Monroe Washington which is DOC ONLY facility for housing serious mentally ill offenders. where plaintiff will be able to get the adequate mental health treatment for his mental illness which all class members named as plaintiff's in this suit needs this same treatment for their mental illnesses which this treatment is being denied to them all. Due SOU ONLY has limited bed space and cannot house them all so they are placed in administrative segregation which is not a treatment center and only makes them worse and causes harm to the physically and mentally which by DOC defendants named in this suit continuing to deny the class members named as plaintiff's to this suit adequate mental health treatment they are placing all the class members named as plaintiff's in this suit at risk of harm of the likelihood of harm to plaintiff Michael Denton and all class members to this class action suit named as plaintiff's in this suit (in terms of their safety and health, including mental health) If substantial treatment is continued to be delayed and denied could result in the death to of the class members named as plaintiff's to this class action suit. which class members/plaintiff's Adam Lowery has been continuing to self harm and has been to the emergency room twice now and is in the restraint bed on an illegal iron table with-out a mattress or anything to cover his body from the cold which he is naked with nothing on but a suicide prevention smock, and is being mistreated by staff members here at Washington State Penitentiary who continues to call him Retart's and Integonize him to commit self harm which plaintiff Adam Lowery has been on the restraint bed now for 2 1/2 months now. so is class member ISSIAH KALBEU who is on the restraint bed. so is plaintiff Michael Denton who is back and forth to the restraint bed for continuing to commit self harm due to plaintiff Denton is diagnosed with SHU SYNDROM and ISS suffering from the effects of solitary confinement. which by the defendants. Tim Thrasher, Dr Karie Rainer, Dan Holbrook, Scott Buttice, and Steve Sinclair continuing to have plaintiff Michael Denton and all the class members/plaintiff's named in this class action suit in administrative segregation, keep locks, SHU's, and punitive segregation has placed the class members/plaintiff's to this suit at harms risk, which by doing so the defendants, Tim Thrasher, Karie Rainer, Dan Holbrook, Scott Buttice, Steve Sinclair, Kevin Goodenough, David McKinnie, MHP Lindsey McINTYRE, Steve Hammer, Chuck Pease, has violated Plaintiff Michael Denton, Joseph Simmons, Adam Lowery, Muhammad ALI, ISSIAH KALBEU, DOELFORD WARREN, JAMES MASTLEY, MICHAEL ROBERTS, JOSEPH RUSSELL, Ron Hopkins, KYLE PAYMENT,

and SAMUEL McFarland Constitutional Rights of the Eighth and Fourteenth Amendments of the United States Constitution has been violated by the defendants Tim Thrasher, Dr. Karie Rainer, Dan Holbrook, Scott Buttice, Chuck Pease, Steve Sinclair, Kevin Goodenough, MHP Lindsey McINTYRE, David McKinnie, Steve Hammond for continuing to house plaintiff Michael Denten and all named class members/plaintiffs in this suit in administrative segregation, kepplocks, SHU's, dead lock, or punitive segregation, and by doing so the defendants has violated DOC policy 690.400 - offenders with disabilities SOU AND DOC policy 610.110 - Transfer of offenders for health reasons. which the defendants are responsible for their action and is liable for their negligence, Evil Intent and callous Indifference to all named class action class members/plaintiffs to this class action suit which the defendants continue to house plaintiff Michael Denten and all class members/plaintiffs to this suit in solitary confinement while all time knowing plaintiff Michael Denten is diagnosed with, SHU SYNDROME, PTSD, Borderline personality disorder and antisocial disorder, AS WELL AS THE OTHER CLASS ACTION CLASS MEMBERS/PLAINTIFFS TO THIS CLASS ACTION SUIT WHICH THE DEFENDANTS ALL KNEW OR SHOULD HAVE KNOWN THAT THIS LONG TERM ISOLATION IS CAUSING HARM TO PLAINTIFF DENTEN AND ALL CLASS MEMBERS/PLAINTIFFS NAMED IN THIS SUIT TO DETERIORATE MENTALLY. (SEE PSYCHOLOGICAL EVALUATION / DIMINISH CAPACITY EVALUATION ON PLAINTIFF MICHAEL DENTEN DONE BY DOCTOR ANTHONY EUSANIO ON 3-26-2017 1 OF 37 PAGES READ PAGE 34-37 ATTACHED AS EXHIBIT A) WHICH MHP LINDSEY MCINTYRE REFUSED TO SUBMIT PLAINTIFF DENTEN MENTAL HEALTH TELE CONFERENCE, REFERRAL TO TRANSFER PLAINTIFF TO SAU AT MONROE CORRECTIONAL COMPLEX DUE TO NUMEROUS OF GRIEVANCES FILED ON HER BY PLAINTIFF DENTEN FOR RETALIATION / DISCRIMINATION. (SEE GRIEVANCE RESPONSE / APPEAL FILED BY PLAINTIFF MICHAEL DENTEN ON LINDSEY MCINTYRE ATTACHED AS EXHIBIT C) WHICH WHILE AT MONROE CORRECTIONAL COMPLEX I MW ADMINISTRATIVE SEGREGATION - MHP LINDSEY MCINTYRE CONTINUED TO WATCH PLAINTIFF DENTEN. SUFFER MENTALLY OUT OF RETALIATION DUE TO SHE SAID PLAINTIFF DENTEN ASSAULTED HER HUSBAND SERGEANT MCINTYRE WHO ALSO WORKS AT MONROE CORRECTIONAL COMPLEX AS A SERGEANT AT MCC I MW. / ADMINISTRATIVE SEGREGATION, WHICH ALL THE ABOVE MENTIONED DEFENDANTS, TIM THRASHER, KARIE RAINER, SCOTT BUTTICE, DAN HOLBROOK, CHUCK PEASE, STEVE SINCLAIR, KEVIN GOODENOUGH, DAVID MCKINNIE, LINDSEY MCINTYRE, STEVE HAMMOND WAS ALL SERVED WITH A COPY OF PLAINTIFF DENTEN'S PSYCHOLOGICAL

ON 3-26-2017 And "Notification Petition" to Release Plaintiff Denton from Administrative Segregation due to this Long Term Isolation is causing harm to Plaintiff and causes Plaintiff Denton to Deteriorate mentally. The aboved mentioned Defendants all knew or should have known that they was violating Plaintiff Michael Denton constitutional Rights of the Fourteenth and Eighth Amendment Constitutional Rights of the United States Constitution. (SEE NOTIFICATION Petition Attached AS Exhibit D)" ALSO (SEE: LETTER RESPONSE from Assistant Attorney General Timothy J. Feulner on October 4, 2017 Attached AS exhibit E)" ALSO (SEE: Grievance Complaint Appealed And Exhausted Fully Deemed Non-Grievable Attached AS Exhibit E)" ALSO SEE: (DAILY REPORT of Segregated Offender Suicide Observa-tion Restrictions Attached AS Exhibit F page 1 of 3). and Last SEE: (Letter from Attorney Richard Linn on September 13, 2017 Attached AS exhibit G 1 of 1 pages) which the defendants continued to house Plaintiff Michael Denton and all class members / Plaintiff in Long term solitary confinement / Isolation. which all of the aboved named Defendants knew or should have known that they was violation Plaintiff Denton, and all class members / Plaintiff's named in this class action suit Constitutional Rgnts of the Fourteenth Amendment and Eighth Amendment Constitutional Rgnts of the United States Constitution. which the defendants, Tim Thresher, Dr. Karie Rainer, Dan Helbrook, Chuck Pease, Scott Buttice, Steve Sinclair, Kevin Goodenough, MHP Lindsey McIntyre, David McKinnie, and Steve Hammond all deprived Plaintiff Michael Denton, Joseph Simmons, Adam Lawrey, Muhammad Ali, Issiah Kalbeu, Mel Ford Warren, James Mosley, Michael Roberts, Joseph Russell, Ron Bopkin, Kyle Payment, Samuel McFarland of a protected Liberty Interest to be free from Cruel and Unusual Punishment Plaintiff Michael Denton, Joseph Simmons, Adam Lawrey, Muhammad Ali, Issiah Kalbeu, Mel Ford Warren, James Mosley, Michael Roberts, Joseph Russell, Ron Bopkin, Kyle Payment, Samuel McFarland. Respectfully Request \$5,000,000 in Compensatory Damages. from the Defendants. Tim Thresher, Karie Rainer, Dan Helbrook, Chuck Pease, Scott Buttice, Steve Sinclair, Kevin Goodenough, MHP Lindsey McIntyre, David McKinnie, and Steve Hammond. Personally and Individually And an additional

Tim Thrasher, Karie Rainer, Dan Holbrook, Chuck Pease, Scott Buttice, MHP Lindsey McIntyre, Steve Sinclair, Kevin Gordenagh, David McKinnis, and Steve Hammond, and Dan S Newisser Actions in committing the fore said Acts herein CLAIM I.

### CLAIM II.

The defendants Tim Thrasher, Karie Rainer, Scott Buttice, Dan Holbrook, Steve Sinclair, Steve Hammond, Chuck Pease, Lt. MOORE Sheldon, Sergeant Fletcher ~~William~~ Badge # 7259 officer, scholls. did act with deliberate Indifference to the plaintiff Michael Denton and class member / plaintiff Joseph SIMMONS Rights BY: failure to protect ~~and prevent~~ plaintiff Denton and plaintiff Joseph Simmons from harming them self, and for Retaliation against them for exercising their first Amendment Constitutional Right to file grievances and for instructing and Intaganizing Plaintiff Denton and plaintiff Simmons to kill them self, on December. 31, 2017. ION1 suicide watch officer scholls who was assigned to watch plaintiff Denton who was on suicide watch in observation cell E02. Plaintiff Denton ask officer to fill out A GRIEVANCE form for him due to plaintiff was on suicide watch at the time. officer scholls. stated to plaintiff Denton "fuck off you Dumb Retard." at this time plaintiff Denton asked officer scholls what did you say to me? and officer scholls stated to plaintiff Denton. " You heard me you dumb piece of shit Retard. I said fuck off you aint got shit coming" At this point plaintiff Denton requested to speak with the on duty Sergeant that's when officer scholls stated to plaintiff Denton "I aint calling the Sergeant why dont you try to kill yourself like the dumb fuck next door in I cell is trying to do" which officer scholls was referring to plaintiff Joseph Simmons who was in E01 observation cell on suicide biting his Risk and spitting blood on the wall. caught on surveillance CAMERAS in the observation E01 cell which both officer scholls and plaintiff Simmons ION1 watch officers all laughed at plaintiff Simmons and. intaganized him to continue to commit self harm at this time. plaintiff Denton grabbed A sharp piece of paint chip off the ground and started cutting his Risk with the paint chip.

until plaintiff's self-harm stopped. Plaintiff Denton and  
 which officer Scholls just laughed at plaintiff Denton and  
 Then officer Scholls started to plaintiff Denton "make sure you  
 do a good job and kill yourself Retard" for 1 hour and 45  
 minutes plaintiff was cutting his risk while his watch officer  
 Scholls intagranized plaintiff to continue to commit self harm which  
 both plaintiff Denton and Simmons was allowed to continue to  
 self harm for 1 hour and 45 minutes and nobody tried to stop  
 them. At this moment plaintiff Denton started banging his head  
 on the Glass window after banging his head for 35 minutes  
 plaintiff head had a huge knot on his head with blood pouring  
 out after 1 hour of banging his head against the Glass  
 SGT Fletcher showed up and told plaintiff to stop or  
 he could kill himself. After plaintiff continued to bang his  
 head on the glass. SGT Fletcher walked off and said "Fuck  
 him call me when they dead "Dumb fucking Retards" referring  
 to plaintiff Denton and Plaintiff Simmons who continued to  
 harm themselves for 3 hours. Plaintiff Denton and plaintiff  
 Simmons was left unattended and allowed to continue to  
 commit self harm, that's when LT Moore William showed  
 up and directed plaintiff to stop if he wanted medical attention  
 when plaintiff Denton continued to bang his head. LT William Moore  
 walked off and instructed officer Scholls to call him in 30  
 minutes if plaintiff Denton and Plaintiff Simmons continue to  
 commit self harm. 45 minutes later at the end of the 2 to 10  
 shift plaintiff stopped banging his head and was placed in the restraint  
 bed without a mattress on the restraint bed. which LT Moore  
 said to plaintiff Denton "This should teach you not to bang your  
 head Retard" for 4 hours plaintiff Denton was allowed to  
 commit self harm to him self and officer Scholls, SGT Fletcher,  
 or LT Moore did not try to stop him or plaintiff Simmons  
 from harming them self, which this is a common practice at  
 Washington State Penitentiary of allowing mentally ill inmates  
 to try to kill themselves instead of preventing them from harming  
 them selves they are encouraged to continue to harm them selves.

And by not preventing plaintiff Denton and plaintiff Simmons from harming themselves the following defendants violated plaintiff Michael Denton and Joseph Simmons Constitutional Rights of the Eighth Amendment and Fourteenth Amendment Constitutional Rights of the United States Constitution which the defendants: Tim Thrasher, Karie Rainer, Dan Holbrook, Scott Buttice, Steve Sinclair, Chuck Pease, Steve Hammond, LT. Sheldon Moore, Sgt William Fletcher, and officer Scholls. At WSP all knew or should have known that by not preventing plaintiff Denton and plaintiff Simmons from harming themselves for 4 hours that they was violating plaintiff Denton and plaintiff Simmons Constitutional Rights of the Fourteenth and Eighth Amendment Rights of the United States Constitution which Both incidents of plaintiff Michael Denton and Joseph Simmons was caught on surveillance camera inside MHU E unit suicide observation cell E02 which housed plaintiff Michael Denton and suicide observation cell E01 which housed plaintiff Joseph Simmons. which each cell E01 and E02 has 2 surveillance cameras that record full video footage at all times that both plaintiff Michael Denton and Joseph Simmons was inside these cells on suicide observation watch, each defendant knew or should have known that by them not preventing plaintiff Denton and plaintiff Simmons from harming themselves that they was violating plaintiff Denton and plaintiff Simmons Constitutional Rights of the Fourteenth and Eighth Amendment Constitutional Rights of the United States Constitution. Plaintiff Michael Denton and plaintiff Joseph Simmons respectfully request compensatory damages in the amount of \$1,000,000 U.S. dollars from the defendants LT. Sheldon Moore, Sgt William Fletcher, WSP officer Scholls, Tim Thrasher, Karie Rainer, Dan Holbrook, Scott Buttice, Steve Sinclair, Chuck Pease, Steve Hammond personally and individually and an additional \$1,000,000 U.S. dollars in punitive damages for the evil intent and callous indifference caused by the defendants. LT. Sheldon Moore,



SGT. William [unclear], Karie Rainer, Dan Holbrook, Scott Buttice, Steve Sinclair, Chuck Pease, Steve Hammond, **ACTIONS** in committing the fore said Acts herein Claim number **II**.

### CLAIM III.

The defendants Tim Thresher, Karie Rainer, LT. Sheldon Moore, LT Miller at WSP, Dan Holbrook, Scott Buttice, Steve Sinclair, Chuck Pease, Steve Hammond did act with deliberate Indifference to the rights of plaintiff Michael Denton, **JOSEPH** Simmons, Melford Warren, Issiah Kalbeu, Adam Lowery, Muhammad Ali, James Mosley, Michael Roberts, Joseph Russell, Ron Bopkin, Kyle Payment, Samuel McFarland. BY: Creating and enforcing A Illegal policy of forcing **potentially** ill inmates to urinate and Defecate inside A hole in the ground inside the Suicide observation cell At Washington State Penitentiary. which plaintiff Denton and all the aboved mentioned class members/ plaintiff to this class action suit was forced to urinate and defecate inside A hole in the ground that has A metal bar grates on the hole, which plaintiff Denton and all class members/ plaintiffs named in this class action suit was forced ~~to~~ urinate, and Defecate in A **Hole** on suicide observation in E unit MHU E02 cell which Washington State Penitentiary only have four Suicide observation cells. At the prison which all have A hole in the ground for **mentally** ill inmates to urinate and defecate. which plaintiff Denton was forced to by LT. Moore and LT. Miller to defecate in A hole in A ground which plaintiff had to Squat down **Naked** over the hole in front of male and female officers walking by the observation cell which plaintiff Denton had to use his bare hands to push his own feces down the bars on the hole in the ground in the cells which these Suicide observation cells do not have a toilet or sink for inmates to drink water or wash their hands which plaintiff and all class members/ plaintiffs

to this class of mentally ill inmates with soap  
 due to the suicide observation cells do not have a toilet or sink  
 for mentally ill inmates to drink water when they want or to wash  
 their hands, which plaintiff Denton had to eat his food with feces  
 still on his hands, when plaintiff complained about this to LT Moore  
 and LT Miller while they was doing their cell unit records plaintiff  
 Denton told Both LT Moore and LT Miller that this was Inhumane  
 and was unconstitutional and cruel and unusual punishment to  
 mentally ill inmates. Both LT Moore and LT Miller stated to plaintiff  
 "if you want to use the bath room you will have to shit and piss  
 in that hole and if you dont like it dont go on suicide and  
 that its policy. At WSP and thats just how its going to be"  
 The defendants Dan Holbrook, Tim Thrasher, Karie Rainer, LT Sheldon  
 Moore, LT Miller, Scott Buttice, Steve Sinclair, Chuck Pease,  
 Steve Hammond. knew or should have known that by forcing  
 plaintiff Denton and all class members/plaintiffs named in this  
 suit to urinate and defecate in a hole in the ground and by  
 denying plaintiff Denton and all class members/plaintiffs named  
 in this suit water to drink for days at a time due to the  
 suicide observation cells do not have toilets or sinks to drink water  
 and wash your hands. which Washington state penitentiary is the  
 only facility that has a hole in the ground in the suicide observation  
 cells for inmates to use the bathroom in all the other prisons in  
 Washington state Department of corrections have toilets and  
 sinks on them inside all suicide observation cells. for inmates to  
 drink water and wash their hands and use the bath room, which  
 plaintiff Denton had to push his own feces down the hole in  
 the ground with his bare hands the aboved named Defendants  
 all knew or should have known that they was violating plaintiff  
 Michael Denton and all class members/plaintiffs named in this suit  
 constitutional rights of the Eighth and fourteenth amendment constitu-  
 tional rights of the United States constitution. which Washington state  
 penitentiary has a policy and common practice of forcing  
 mentally ill inmates to urinate and defecate in a hole in the

hole in the ground and they are made to scrub and  
 water to wash their hands and Drink water, Being done as A  
 form of punishment to plaintiff Denton and all class members  
 / Plaintiff's named in this class action suit plaintiff Michael  
 Denton, Joseph Simmons, Adam Lowery, ISSIAH KALBEU,  
 MELFORD WARREN, MUHAMMAD ALI, James Mostey, Michael  
 Roberts, Joseph Russell, Ron Hopkins, KYLE PAYMENT, Samuel  
 McFarland Respectfully Request Compensatory Damages  
 in the Amount of \$1,500,000 U.S. Dollars. from the defendants  
 Tim Thrasher, Karie Rainer, LT. Sheldon Moore, LT. Miller, Dan  
 Holbrook, Scott Buttice, Steve Sinclair, Chuck Pease, Steve  
 Hammond. personally and Individually and an additional  
 \$1,500,000 U.S. Dollars in punitive Damages for the Evil  
 Intent and Callous Indifference caused by the defendan-  
 ts Tim Thrasher, Karie Rainer, LT. Sheldon Moore,  
 LT. Miller, Dan Holbrook, Scott Buttice, Steve  
 Sinclair, Chuck Pease, Steve Hammond.  
 Actions in committing the foreSaid Acts herein  
 Claim Number **III**.

### CLAIM IV.

The defendants Tim Thrasher, Karie Rainer, LT. Sheldon Moore,  
 MHP Jaime Davis, LT. Miller, Dan Holbrook, Scott Buttice, Steve  
 Sinclair, Chuck Pease, and Steve Hammond did act with deliber-  
 ate Indifference to the Rights of plaintiff Denton, Simmons, Lowery,  
 Kalbeu, Warren, ALI, BY: Illegally forcing seriously mentally  
 ill inmates at Washington State Penitentiary to be placed on A  
 Illegal outLined Iron Table outdated Restraint Table with  
 out A mattress on this Iron Bed. being done out of Retaliation.

to force mentally ill inmates to sleep on a table if however when plaintiff Adam Towerk has been on this Illegal restraint Table that's Iron and does not have a mattress on it. which Plaintiff Adam Towerk has been on this Iron Table for 2 months now, Plaintiff ISSAIAH KALBEU is also on this Illegal Iron Bed without a mattress on it with Restraint Straps on as tight as could be to make it as uncomfortable as possible for him while he is on ~~THIS~~ Illegal Iron Table that has been outlawed and is out dated, which Plaintiff Michael Denten is often on this Illegal Iron ~~RES~~ restraint Table. which staff put the Restraints on him as tight as could be and they remove the mattress off the Table to make Plaintiff Denten uncomfortable as possible while he is on this Table. due to he is a threat to him self and others at the time, which MHP Jamie Davis was the on duty MHP Duty officer who approved for the mattress to be taken off the Iron Restraint Table for no reason, which the defendants. Refuse to allow mentally ill offenders a Blanket to keep them warm or socks on their feet while Naked on this Iron Table with nothing but a towel covering their private parts in freezing cold temperatures due to its winter time, which Plaintiff Denten was force to lay on this bed for two days in freezing cold temperatures and LT. Moore and LT. Miller refused to allow Plaintiff Socks and a Blanket to be placed over him while on this Illegal Iron Table bed. which the defendants. Tim Thrasher, Karie Rainer, LT. Sheldon Moore, MHP Jamie Davis, LT. Miller, Dan Hillbrook, Scott Buttice, Steve Sinclair, Chuck Pease, and Steve Hammond all enforced this policy of placing mentally ill inmates. Naked on a Iron Table Restraint Table, with nothing to keep them warm. being done out of retaliation to force them to go back to Inmate/Administrative Segregation. which is only causing them to become worse and causes them to deteriorate mentally, the defendants. Tim Thrasher, Karie Rainer, LT. Sheldon

MOORE, MHP JAMES DAVIS, LT MILLER, DAN HOLBROOK, SCOTT BUTTICE, STEVE SINCLAIRE, CHUCK PEASE, and STEVE HAMMOND all ~~KNEW~~ or should have known that by making plaintiff Denton ~~plaintiff~~ adam LOWERY, ISSIAH KALBEU, MUHAMMAD ALI, JOSEPH SIMMONS, MELFORD WARREN, be placed on A Iron metal Restraint Table NAKED with none but A stawl to COVER their private parts with. in freezing cold Temperatures induring winter Season. and by placing plaintiff Adam Lowery and plaintiff ISSIAH KALBEU on this Iron metal Table OUT of retaliation For Alledged ASSAULTS on staff THE defendant knew or should have known that they was violating the plaintiffs michael Denton, ISSIAH KALBEU, Adam Lowery, MELFORD WARREN, Muhammad ALI, Joseph Simmons, Constitutional Rights of The Eighth and fourteenth Amendment Constitutional Rights of the United States constitution. Plaintiff, michael Denton, ISSIAH KALBEU, Adam Lowery, MELFORD WARREN, Muhammad ALI, Joseph Simmons, Respectfully Request compensatory damages in the amount of \$ 1,000,000 U.S. Dollars, From the defendants. Tim Thrasher, Karie Rainer, LT. Sheldon moore, MHP James Davis, LT. miller, Dan Holbrook, Scott buttice, Steve Sinclair, Chuck Pease, and Steve Hammond. personally and Individually and AN additional \$ 1,500,000 U.S. dollars in penitive damages. for the evil Intent and callous Indifference caused by the defendants ~~Tim~~ Thrasher, Karie Rainer, LT. Sheldon moore, MHP James Davis, LT. miller, Dan Holbrook, Scott buttice, Steve Sinclair, Chuck Pease, and Steve Hammond Actions. in committing the for said acts Here in Claim. IV.

### V. RELIEF

( State briefly exactly what you want the court to do for you. make no legal arguments. cite no cases or statutes.)

Plaintiff's Request for A Permanent Injunction be ISSUED Against the Washington State Department of Corrections to immediately be restrained from continuing to house the plaintiffs in administrative Segregation, Keyplock, deadlock, SHU'S or punitive

Segregation and Release them from the segregation units in Washington State Department of Corrections due to plaintiffs are suffering from the effects of this long-term isolation which is causing them to deteriorate psychologically, and for them all to be transferred to SW Special Offender Unit at Monroe Correctional Complex Treatment Center for seriously mentally ill offenders mainline where they could be treated for their serious mental illnesses; Plaintiff's Request for a permanent Injunction to be issued Against the Department of Corrections in Washington State to immediately be ordered to build more mental health treatment centers to house seriously mentally ill offenders that will meet their needs; Plaintiff Request for a permanent Injunction be issued Against the department of corrections in Washington State to immediately be ordered / restrained from making seriously mentally ill offenders housed at the Washington State Penitentiary in suicide observation cells on MHU F unit suicide watch, that it be ordered for the defendants can no longer use these observation cells to house inmates on suicide due to these observation cells do not have a toilet or sink for inmates to wash their hands or drink water or use the bathroom and that the defendants be ordered to close these observation cells down until they install toilets with sinks on them for inmates to be able to drink water, wash their hands, and use the bathroom; Plaintiff Request for a permanent Injunction be issued Against the department of correction in Washington State. At the Washington State Penitentiary be immediately ordered to restrain from continuing to use the Iron metal Restraint Tables to place inmates on these Iron tables to be restrained and that the defendant must immediately stop using these Iron metal Tables and that they must order the updated standard Restraint beds immediately and that the defendant no longer be able to take the mattress off these restraint beds; Plaintiff's Request for a permanent Injunction be issued.

Against the wishes of the Defendant, it is ordered to immediately Restrain from Housing mentally ill offenders in Secure Housing Units in Doc Administrative Segregation/INU'S that are diagnosed with SHU SYNDROME, PTSD, Schizophrenia, Personality Disorders, Bipolar, Anti social Disorders, Dissociative Disorders, Dual Disorders, Schizoaffective Disorder, Tourette's Syndrome, and Attention-Deficit/Hyperactivity Disorder, Major Depression, obsessive-compulsive Disorder ("OCD"), Panic Disorders, DEL Diagnosis or MICA (mentally ill and chemically addicted - mental illness with substance abuse), Eating disorder, or any mental illness that will cause them to suffer from the effects of long-term solitary confinement that will place them in the likelihood of harm that Doc can no longer house inmates who suffers from any of these diagnosis/disorders. cannot be housed or placed in Administrative Segregation, Keeplocks, SHU'S, Deadlock, or Punitive Segregation. and that it be ordered that any and all inmates housed in Administrative Segregation suffering from a mental illness must be allowed out of their cell 7 days a week for 2 hours a day for out-of-cell treatment or programming for prisoners with serious mental illness confined in SHU'S or Administrative Segregation and that any and all serious mentally ill prisoners can only be housed in solitary confinement no longer than sixty days. The members of this class action plaintiffs Believe that we are entitled to the following Relief (\$5,000,000 US dollars) in Compensatory Damages. For being Illegally housed in Solitary confinement for years while suffering from a serious mental illness which this long-term solitary confinement caused. The plaintiff in this class action to Deteriorate mentally for being Retaliated against for filing Grievance to challenge this long-term Isolation to mentally ill prisoners for continuing to violate the plaintiffs of this class action soft constitutional Rights And five million (\$5,000,000 US dollars) in punitive Damages for the evil Intent and callous Indifference caused by the defendants ~~TEM~~ Thrasher, Dr Karie Rainer, MHP Lindsey McIntire,

MHP Debra...  
Scott Battice, Steve Simolaire, WSP Officer Scholls, WSP Lt. Sheldon  
Moore, MHP Jaime Davis, WSP Sergeant William Fletcher, Steve  
Hammond, Robert Herzog, Chuck Pease, Constable David McKinnie.  
Actions in committed ~~IN~~ ALL claims. Plaintiffs also seek  
Jury Trial on all issues triable by Jury. Plaintiffs also  
recovery of their cost in this suit, and any additional relief  
this court deems just, proper, and equitable fact defendant  
is sued individually and in his official capacity.

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

Signed this 3rd day of January 2018.

Mark Dutton  
(Signature of Plaintiff)



DEMINISH CAPACITY PSYCHOLOGICAL  
EVALUATION BY DOCTOR ANTHONY EUSANIO  
ON 3/26/2017 PAGES 1 OF 37 ATTACHED  
TO CLASS ACTION CIVIL RIGHTS COMPLAINT  
BY A PRISONER UNDER 42 U.S.C. § 1983

EXHIBIT A

# ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Inmates Claim Solitary Confinement Worsened Mental Illnesses](#)

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