

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

FILED
UNITED STATES DISTRICT COURT
DENVER, COLORADO

JAN 22 2024

JEFFREY P. COLWELL
CLERK

Civil Action No. _____

(To be supplied by the court)

Joshua Omar Garcia, Plaintiff

v.

Jury Trial requested:
(please check one)

☒ Yes ☐ No

Washington County Justice Center

Sgt. Wolever

Lt. G. O'halloran

see attached, Defendant(s).

(List each named defendant on a separate line. If you cannot fit the names of all defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Section B. Do not include addresses here.)

PRISONER COMPLAINT

NOTICE

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

Plaintiff need not send exhibits, affidavits, grievances, witness statements, or any other materials to the Clerk's Office with this complaint.

Defendants Attachment

Claim 1

Washington County Justice Center

Sgt. Wolever

Lt. G. O'halloran

Pallesen

~~Generaux~~ Generaux

Claim 2

~~Generaux~~ Generaux

Sgt. Wolever

Sgt. Shaver

Capt. Stewart

Lt. G. O'halloran

Claim 3

Sgt. Shaver

Generaux

Claim 4

Sgt. Shaver

Gregg

Amended

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Defendants Attachment

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Claim 5

Washington County Justice Center

Lt. G. O'halloran

Sgt. Shaver

Sgt. Wolever

Sgt. Goble

A. PLAINTIFF INFORMATION

You must notify the court of any changes to your address where case-related papers may be served by filing a notice of change of address. Failure to keep a current address on file with the court may result in dismissal of your case.

Joshua Omar Garcia, B2300075, Washington County Justice Center
26861 HWY 34 Akron, Colo. 80720
(Name, prisoner identification number, and complete mailing address)

(Other names by which you have been known)

Indicate whether you are a prisoner or other confined person as follows: (check one)

- ☒ Pretrial detainee
☐ Civilly committed detainee
☐ Immigration detainee
☒ Convicted and sentenced state prisoner
☐ Convicted and sentenced federal prisoner
☐ Other: (Please explain) _____

B. DEFENDANT(S) INFORMATION

Please list the following information for each defendant listed in the caption of the complaint. If more space is needed, use extra paper to provide the information requested. The additional pages regarding defendants should be labeled "B. DEFENDANT(S) INFORMATION."

Defendant 1: Washington County Justice Center
(Name, job title, and complete mailing address)

26861 HWY 34 Akron, Colorado 80720

At the time the claim(s) in this complaint arose, was this defendant acting under color of state or federal law? ☒ Yes ☐ No (check one). Briefly explain:

They have a policy that is against the
law and violating my constitutional rights.

Defendant 1 is being sued in his/her _____ individual and/or ☒ official capacity.

Defendant 2: Sgt. Wolever
(Name, job title, and complete mailing address)

96861 HWY 34 Akron, Colorado 80720

At the time the claim(s) in this complaint arose, was this defendant acting under color of state or federal law? ☒ Yes ☐ No (check one). Briefly explain:

For knowingly breaking the law and saying it is policy, and violating my constitutional rights.

Defendant 2 is being sued in his/her ☒ individual and/or ☒ official capacity.

Defendant 3: Lt. G. Challaran
(Name, job title, and complete mailing address)

96861 HWY 34 Akron, Colorado 80720

At the time the claim(s) in this complaint arose, was this defendant acting under color of state or federal law? ☒ Yes ☐ No (check one). Briefly explain:

For upholding the breaking of law and saying it is policy, and violating my constitutional rights.

Defendant 3 is being sued in his/her ☒ individual and/or ☒ official capacity.

C. JURISDICTION

Indicate the federal legal basis for your claim(s): (check all that apply)

☒ State/Local Official (42 U.S.C. § 1983)

☒ Federal Official

As to the federal official, are you seeking:

☒ Money damages pursuant to *Bivens v. Six Unknown Named Agents of Fed. Bureau of Narcotics*, 403 U.S. 388 (1971)

☒ Declaratory/Injunctive relief pursuant to 28 U.S.C. § 1331, 28 U.S.C. § 1361, or 28 U.S.C. § 2201

☐ Other: (please identify) _____

"B. DEFENDANT(S) INFORMATION." pg 1^A
Claim 1

Defendant 4: Pallesen

26861 HWY 34 Akron, Colorado 80720

At the time the claim(s) in this complaint arose, was this defendant acting under color of state or federal law? ☒ Yes ☐ No (check one).

Briefly explain: By knowingly breaking the law and saying it is policy, and violating my constitutional rights.

Defendant 4 is being sued in his/her ☒ individual and/or ☒ official capacity.

Defendant 5: ~~Generax~~ Generax

26861 HWY 34 Akron, Colorado 80720

At the time the claim(s) in this complaint arose, was this defendant acting under color of state or federal law? ☒ Yes ☐ No (check one).

Briefly explain: By knowingly breaking the law and saying it is policy, and violating my constitutional rights.

Defendant 5 is being sued in his/her ☒ individual and/or ☒ official capacity.

"B. Defendant(s) Information."

Claim 2

Defendant 1: General

26861 HWY 34 Akron, Colorado 80720

At the time the claim(s) in this complaint arose, was this defendant acting under color of state or federal law? ☒ Yes ☐ No (check one).

Briefly explain: He lied about Policy, instigated in the situation, and assaulted me, and broke Policy, and put me in a choke hold.

Defendant 1 is being sued in his/her ☒ individual and/or ☒ official capacity.

Defendant 2: Sgt. Wolever

26861 HWY 34 Akron, Colorado 80720

At the time the claim(s) in this complaint arose, was this defendant acting under color of state or federal law? ☒ Yes ☐ No (check one).

Briefly explain: He lied about Policy, broke Policy, and assaulted me.

Defendant 2 is being sued in his/her ☒ individual and/or ☒ official capacity.

"B. Defendant(s) Information."
Claim 2

Defendant 3: Sgt. Shaver

26861 HWY 34 Akron, Colorado 80720

At the time the claim(s) in this complaint arose, was this defendant acting under color of state or federal law? ☒ Yes ☐ No (check one).

Briefly explain: He ran the hearing for the write up, and didn't give me my rights.

Defendant 3 is being sued in his/her ☒ individual and/or ☒ official capacity.

Defendant 4: Capt. Stewart

26861 HWY 34 Akron, Colorado 80720

At the time the claim(s) in this complaint arose, was this defendant acting under color of state or federal law? ☒ Yes ☐ No (check one).

Briefly explain: He lied to the personal at the hospital and said that I hurt myself.

Defendant 4 is being sued in his/her ☒ individual and/or ☒ official capacity.

"B. Defendant(s) Information."
Claim 2

Defendant 5: Lt. G. O'halloran

26861 HWY 34 Akron, Colorado 80720

At the time the claim(s) in this complaint arose,
was this defendant acting under color of state or
federal law? ☒ Yes ☐ No (check one).

Briefly explain: For going along with this
situation and putting me on Administrative
Segregation.

Defendant 5 is being sued in his/her ☒ individual
and/or ☒ official capacity.

"B. Defendant(s) Information,"
Claim 3

pg ①

Defendant 1: Sgt. Shaver

26861 HWY 34 Akron, Colorado 80720

At the time the claim(s) in this complaint arose,
was this defendant acting under color of state or
federal law? ☒ Yes ☐ No (check one).

Briefly explain: He is forcing me to choose
between using limited out-of-cell time for ~~showers~~ ^{shower and cleaning}
or for access to the law library.

Defendant 1 is being sued in his/her ☒ individual
and/or ☒ official capacity.

Defendant 2: Genereux

26861 HWY 34 Akron, Colorado 80720

At the time the claim(s) in this complaint arose,
was this defendant acting under color of state or
federal law? ☒ Yes ☐ No (check one).

Briefly explain: He is forcing me to choose between
using limited out-of-cell time for shower and
cleaning or for access to the law library.

Defendant 2 is being sued in his/her ☒ individual
and/or ☒ official capacity.

"B. Defendant(s) Information."
Claim 4

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pg 11

Defendant 1: Washington County Justice Center
26861 HWY 34 Akron, Colorado 80720

At the time the claim(s) in this complaint arose,
was this defendant acting under color of state or
federal law? ☒ Yes ☐ No (check one).

Briefly explain:

Defendant 1 is being sued in his/her ☐ individual
and/or ☒ official capacity.

Defendant 2: Sgt. Shaver
26861 HWY 34 Akron, Colorado 80720

At the time the claim(s) in this complaint arose,
was this defendant acting under color of state or
federal law? ☒ Yes ☐ No (check one).

Briefly explain: He refused to give me my
legal mail. This is a constitutional violation.

Defendant 2 is being sued in his/her ☒ individual
and/or ☒ official capacity.

"B. Defendant(s) Information:"
Claim 4

pg 12

Defendant 3: Gregg
26861 HWY 34 Akron, Colorado 80790

At the time the claim(s) in this complaint arose,
was this defendant acting under color of state or
federal law? ☒ Yes ☐ No (check one).

Briefly explain: He refused to give me my
legal confidential mail. This is against the
constitution.

Defendant 3 is being sued in his/her ☒ individual
and/or ☒ official capacity.

Amended

"B. DEFENDANT(S) INFORMATION"
Claim 5

pg ①

Defendant 1: Washington County Justice Center
26861 HWY 34 Akron, Colorado 80720

At the time the claim(s) in this complaint arose,
was this defendant acting under color of state or
federal law? ☒ Yes ☐ No (check one).
Briefly explain: Living conditions are not
right.

Defendant 1 is being sued in his/her ☐ individual
and/or ☒ official capacity.

Defendant 2: Lt. G O'halloran
26861 HWY 34 Akron, Colorado 80720

At the time the claim(s) in this complaint arose,
was the defendant acting under color of state or
federal law? ☒ Yes ☐ No (check one).
Briefly explain: Living conditions are not
right.

Defendant 2 is being sued in his/her ☒ individual
and/or ☒ official capacity.

"B. DEFENDANT(S) INFORMATION."

Claim 5

B(2)

Defendant 3: Sgt. Shaver

26861 HWY 34 Akron, Colorado 80720

At the time the claim(s) in this complaint arose,
was this defendant acting under color of state or
federal law? ☒ Yes ☐ No (check one).

Briefly explain: Living conditions are not right.

Defendant 3 is being sued in his/her ☒ individual
and/or ☒ official capacity.

Defendant 4: Sgt. Wolever

26861 HWY 34 Akron, Colorado 80720

At the time the claim(s) in this complaint arose,
was this defendant acting under color of state or
federal law? ☒ Yes ☐ No (check one).

Briefly explain: Living conditions are not
right.

Defendant 4 is being sued in his/her ☒ individual
and/or ☒ official capacity.

"B. DEFENDANT(S) INFORMATION."

Claim 5

pg ③

Defendant 5: Sgt. Goble

28861 HWY 34 Akron, Colorado 80720

At the time the claim(s) in this complaint arose,
was the defendant acting under color of state or
federal law? ☒ Yes ☐ No (check one).

Briefly explain: Living conditions are not
right.

Defendant 5 is being sued in his/her ☒ individual
and/or ☒ official capacity.

Amended

D. STATEMENT OF CLAIM(S)

State clearly and concisely every claim that you are asserting in this action. For each claim, specify the right that allegedly has been violated and state all facts that support your claim, including the date(s) on which the incident(s) occurred, the name(s) of the specific person(s) involved in each claim, and the specific facts that show how each person was involved in each claim. You do not need to cite specific legal cases to support your claim(s). If additional space is needed to describe any claim or to assert additional claims, use extra paper to continue that claim or to assert the additional claim(s). Please indicate that additional paper is attached and label the additional pages regarding the statement of claims as "D. STATEMENT OF CLAIMS."

CLAIM ONE: Attachment "D. Statement of Claims."Claim one is asserted against these Defendant(s): Attachment "B. Defendant(s) Information"

Supporting facts:

~~X~~ Claims
5

"D. Statement Of Claims."
claim 1

P.
pg ①

On 03-31-2023 I got to Washington County Justice Center and while being booked in they made me give them all my legal confidential documents and they photo copied them on a bluetooth photocopier and gave me the copies. They then put the originals in a non-sealed property bag that they keep up front. The whole time I was telling them that I did not want them to photocopy my documents. They said I would not get them if I did not. I told them I was going to do it under duress.

On 05-29-2023 the staff (Palleen) would not let me have my legal confidential mail without photocopying them, and then putting the originals in a non-sealed property bag up front. They gave me the copies. I was telling them that this was against the law, and I only did it under duress. They told me it is their Policy.

On 06-01-2023 this happened again with different staff. (Sgt. Wolever) ~~Genereux~~ ^{Genereux} ~~(Sgt. Wolever)~~
Again they told me it was their Policy. I again told them I am only doing it under duress.

"D. Statement Of Claims."
Claim 1

pg 2

On 06-20-2023 Staff (Genereux) brought me my legal confidential mail with 3 in. by 4 in. of one of the corners ripped or cut open.

- This is a violation of my 1st, 4th, 5th, 8th, and 14th Constitutional Amendments, and 6th Amendment.
- I know this is against the law, both copying and keeping originals outside of my possession.
- I have informed them that it is against the law, by 28 C.F.R. 540.18.
- I have talked to Floor officers(s), Sgt.(s), and the Lt.
- I have filed requests to Sgt(s), and to the Lt.
- I have filed grievances.
- 1st Amendment - Free speech - Attorney-client - confidentiality - violation.
- I told them that ~~because~~ they were copying my legal mail, and that I was under duress, by them doing it.

"D. Statement of Claims."

Claim 1

Pg 3

- These things stripes protected communications of their confidentiality, interferes with protected communications, and takes away the asurance that officials will not read the legal confidential mail.

- Our legal mail is supposed to be opened in front of us to insure us that officials will not read the mail.

- This is mentally draining.

- 28 C.F.R. § 540.18 (a) & 28 C.F.R. § 540.19 (b)

- I'm having a hard time figuring this stuff out.

- They give everyone access to a 2022 handbook that says they can do this. They have a 2023 Policy that says they are not supposed to do this, yet they still do.

- Interference with legal mail and everything associated.

- I feel they are reading my legal mail.

- I have been over stressed about this issue. I did not have any gray hair untill I started dealing with this.

- Interference of access to courts.

"D. Statement of Claims."
Claim 2

pg 1

On 06-1-2023 I was let go from the kitchen. I filed a grievance on the kitchen staff. On 06-13-2023 I was told by staff (Genereux) that I had to move pods because I was let go from the inmate workers program. He told me that it is Policy.

I have read the Policy(s) in the inmate handbook and I told him that it is not Policy. He told me I had to move. I told him that I refused to move until I talked to a Sgt.

The Sgt. (Wolever) came and I tried to talk to him about it. He told me to come to the rec. room to talk, I did this.

While trying to talk to the Sgt., Genereux kept cutting me off and kept instigating the situation. I asked him to stop, and he would not. I asked him to leave, and then he told the Sgt. to handcuff me.

Sgt. Wolever grabbed my wrist, I tried to turn to him to try to plead him into talking to me. That I was still being reasonable.

Then they both grabbed me and started to push me around. I froze up not knowing what to do. They started to knee me and this caused me pain. They started pushing me around

"D. Statement Of Claims."
Claim 2

Pg 2

again. They finally threw me on my face which hurt and then they handcuffed me behind my back.

They then picked me up by the handcuffs and carried me by the handcuffs which caused me severe pain, in my wrists, arms, and back. My toes were barely able to touch the floor most of the time.

They ran my head into door jams which caused me pain and ~~and~~ made me see stars. They then threw me on my face again in a cell which busted my lip, again causing me pain.

They started to unhandcuff me, so I went to sit up and Genereux jumped on my back and put his arm around my neck. Sgt. Wolever pulled a tazer and started tazing me a number of times. This really hurt, so I grabbed his wrist that was holding the tazer, and held it away from me. I told them to get out, and they left.

They were refusing to let me see medical so I told them that I had to go to the hospital.

• Nowhere in their Policy does it say that they

"D Statement of Claims Claim 2

move people that get Removed From the Worker Program. This is not Policy.

- they had no Reason to move me
- there is not a Worker pod, so they were not moving me out of a Worker pod
- I was not being moved to a different Classification
- I Feel this was harassment For Filing a Grievance on a Kitchen Staff.
- I was not Being Violent, harmful, or threatening.
- I was Being Reasonable.
- I would Have went where ever they told me to go. I went to the Rec Room with them.
- their policy say that they are not to put their Hands on me unless they were physically protecting themselves, Someone else, Stopping me From hurting myself or moving Someone in a Reasonable manner.
- there was not a Reason to move me so it was not Reasonable
- they used excessive force
- my Rights were violated in a number of ways
- I don't Feel Safe
- 8th Amendment Violation
- I was physically injured. my wrist were bruised & swollen. I Don't bruise easily. I am still-

"D. Statement Of Claims."
Claim 2

pg 1

suffering back and neck stiffness and pain. My head had some pretty big lumps on it. I had a busted lip. I have been having a lot of head aches. I suffered a lot of pain.

- They refused to take me to medical.
- They took pictures of one of my head injuries, and my wrists.
- They did not take pictures of all my injuries.
- When Capt. Stewart ~~took me~~ and Sgt. Shaver took me to the hospital, Capt. Stewart told the medical staff that I did it to myself.
- I did not feel safe to talk to the medical staff because Capt. Stewart and Sgt. Shaver refused to leave the room.
- 14th Amendment right to medical privacy violation.
- Lt. G. O'Halloran put me in Administrative Segregation, on 06-14-2023.
- I recieved a write up on 06-22-2023 by Sgt. Wolever.
- I had a hearing on 07-04-2023 by Sgt. Shaver.
- I was given my disposition on 07-10-2023.

• This is a private facility.

• I also feel this was retaliation for starting a

"D. Statement Of Chims."
Claim 2

pg 5

lawsuit for the legal mail issue.

- I have exhausted my grievances.
- It is against state law to put me in a choke hold like Genereux did.

"D. Statement Of Claims."

Claim 3

pg 1

On 07-08-2023 Sgt. Shaver was forcing me to choose between using my limited out-of-cell time for shower, cleaning and phone or access to the law library. I only get allowed 1 hour out a day in segregation here in Washington County Justice Center. At about ~~06:00~~ 6-6:30pm.

- 8th Amendment on not being able to shower and clean my cell violation, health and safety.
- 1st Amendment violation of adequate law library time access.

I have been forced with this ~~on~~ a number of times, while I have been in segregation at this facility.

- I feel that 1 hour is still not enough time on the law library.
- This is mentally draining.

On 07-09-2023 Genereux was forcing me to choose between using my limited out-of-cell time for shower, cleaning my cell and phone access or access to the law library. At about 6:00pm.

- I have sent grievances.

"D. Statement Of Claims."
Claim 3

p.1
pg 2

• I feel that I was in need to meet a deadline because I am in fear for my safety because of the excessive force that was used on me.

"O. Statement of Claims."
Claim 4

Pg 11

On 07-13-2023 at 9:24pm Sgt. Shaver asked me if I wanted to have them copy my legal mail so they can give me the copies. I said that I did not want my legal mail copied. He said that it is policy, I said it is against the law to copy my legal mail according to 28 C.F.R. 540.18. He refused to give me my legal mail by law.

I was at least told that it was from my Federal Public Defender (Timothy Patrick O'Hara). They said that they were going to put it up front in my property that I don't have access to.

On 07-14-2023 at 9:22pm Gregg asked me if I wanted to go down to have them photo copy my legal mail for them to give me my mail. I told him that I am not refusing my legal mail but that I do refuse to allow them to copy my legal confidential mail. He refused to give me my legal mail and told me that it is their policy to copy legal mail. I told him that it is against the law to copy my legal mail according to 28 C.F.R. 540.18 and that it is against the constitution to refuse me my legal mail. This mail was from Jacob Rasch-Chabot.

"D. Statement of Claims."
Claim 4

Pg 2

- This is against my constitutional amendment rights of 1st, 4th, 5th, 8th, and 14th amendments.
- I have filed grievances on these matters.
- I think they are reading my legal mail when they copy them, ~~and~~ through the printers memory or in the property they keep up front.
- If I allow them to copy my legal mail under duress is the only way I can receive my legal mail.
- This is a 6th Amendment violation also.

"D. Statement of Claims."
Claim 5

pg 11

Our living conditions are really bad here because there are a lot of conditions not being met and conditions being violated. Here is a list of at least the ones I am aware of: 6 CCR 100-13 and 28 CFR

bed spacing is not right, we are being over ~~crowded~~ crowded and because of this we are not afforded the correct space in the cells that we are supposed to have. We are not getting 35 sq feet ~~per~~ per person in the Dayrooms. There is not enough seating and writing surfaces in the Dayrooms. There are not enough showers and a lot of the showers are broke anyways and the staff does not allways bring the shower curtains.

They don't provide books, board games, and sometimes they don't turn on the TVs.

They skip us on razors and hair trimers and nail cutters all the time. They skip our laundry. They lock us down and don't check on us. They punish people for things that they had nothing to do with. They take things from us for one persons actions. They don't allow the correct air flow. We don't

Amended

"D. Statement of Claims."
Claim 5

pg 9

get our 1 hour of rec. a day that we are supposed to get. They were photocopying our legal mail, and keeping the original where they could view them. The toilets are always backing up. The food has been uncooked, stale and soggy, and not the correct nutrition and not the right portion. The grievance procedure is not right. Staff are answering grievances about ~~themselves~~ themselves. There is not enough space to put our hygien cloths-clean and dirty and our commissary and personal effects. When we are locked down they strip cells and they don't let them out for their hour out. They talk down to us and yell at us. The kitchen does not have a correct kasher and kashering procedure, space, and food. They are putting post convicted people with pre-trial people. They do not have ~~sufficient~~ sufficient medical staff and equipment. All these things and more are playing hell on my physical and mental health. It is the combination of all this that I feel is a living condition claim. They hassled, harassed and strangled me.

E. PREVIOUS LAWSUITS

Have you ever filed a lawsuit, other than this lawsuit, in any federal or state court while you were incarcerated? ☐ Yes ☒ No (check one).

If your answer is "Yes," complete this section of the form. If you have filed more than one previous lawsuit, use additional paper to provide the requested information for each previous lawsuit. Please indicate that additional paper is attached and label the additional pages regarding previous lawsuits as "E. PREVIOUS LAWSUITS."

Name(s) of defendant(s): _____

Docket number and court: _____

Claims raised: _____

Disposition: (is the case still pending?
has it been dismissed?; was relief granted?) _____

Reasons for dismissal, if dismissed: _____

Result on appeal, if appealed: _____

F. ADMINISTRATIVE REMEDIES

WARNING: Prisoners must exhaust administrative remedies before filing an action in federal court regarding prison conditions. See 42 U.S.C. § 1997e(a). Your case may be dismissed or judgment entered against you if you have not exhausted administrative remedies.

Is there a formal grievance procedure at the institution in which you are confined?

☒ Yes ☐ No (check one)

Did you exhaust administrative remedies?

☒ Yes ☐ No (check one)

G. REQUEST FOR RELIEF

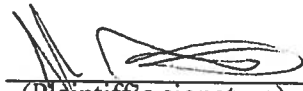
State the relief you are requesting or what you want the court to do. If additional space is needed to identify the relief you are requesting, use extra paper to request relief. Please indicate that additional paper is attached and label the additional pages regarding relief as "G. REQUEST FOR RELIEF."

Attachment "G. Request for Relief."

H. PLAINTIFF'S SIGNATURE

I declare under penalty of perjury that I am the plaintiff in this action, that I have read this complaint, and that the information in this complaint is true and correct. *See* 28 U.S.C. § 1746; 18 U.S.C. § 1621.

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



(Plaintiff's signature)

07-18-2023

(Date)

(Revised November 2022)

"G. Request For Relief."
Claim 1

pg 1 p 1

- ① I want this to stop, for me and everyone else.
- ② I want any and or all copies and originals that are not in my possession to be destroyed, along with the copies stored on the printer and or photocopiers hard drive memorys.
- ③ I am asking that all are held accountable for any crimes committed against me and the law, and/or violations being committed.
- ④ I want to be reimburst for any and all expenses for lawsuit.
- ⑤ Relief of (\$700,000.00).
- ⑥ I am seeking "Relief".
- ⑦ I am seeking "injunction".

"G. Request For Relief."
Claim 2

pg 1 p.1

- ① I am asking that all are held accountable for any crimes committed against me, or violations done.
- ② I am asking to be reimbursed for any and all expenses for lawsuit.
- ③ I am asking for Relief of (\$1,000,000.00).
- ④ I am asking for restraining orders.
- ⑤ I am seeking Relief.

"G. Request For Relief."
Claim 3

p. 11

pg 1

- ① I want this to stop, for me and everyone else.
- ② I am asking that all are held accountable for any violations done to me and everyone else, and any ~~other~~ crimes committed.
- ③ I want to be reimbursed for any and all expenses for lawsuit.
- ④ Relief of (\$100,000.00).
- ⑤ I am seeking "Relief".

"G. Request For Relief."
Claim 4th

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pg ①

- ① I want this to stop for me and everyone else.
- ② I am asking that all are held accountable for any crimes committed against me and the law, and/or violations being committed.
- ③ I want to be reimbursed for any and all expenses for lawsuit.
- ④ Relief of (\$700,000.00).
- ⑤ I am seeking "Relief".
- ⑥ I am seeking "injunction".

Amended

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"G. Request for Relief."
Claim 5

pg ①

- ① I want all this to stop.
- ② I want all to be held accountable.
- ③ I want to be compensated for the physical and mental trauma and anguish that I have suffered and the effects that it ~~had~~ had and will have on my quality of life.
- ④ I am seeking "Relief".
- ⑤ Relief of (\$200,000.00).
- ⑥ I want to be reimbursed for any and all expenses for lawsuit.

Legal mail Exhibit

pg 1

- 28 C.F.R. 500.1 - Definitions - Warden, staff, inmate
- 540.2 - Definitions - Special mail
- 540.18 - Special mail
- 540.19 - Legal correspondence
- U.S. Constitution Amendment; 1, 4, 5, 8, 14
- 1st - Or abridging the freedom of speech,
- 1st - to petition the Government for a redress of grievances.
- 4th - The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated.
- 5th - nor shall be compelled in any criminal case to be a witness against himself,
- 5th - nor be deprived of life, liberty, or property, without due process of law;
- 8th - nor cruel and unusual punishments inflicted.
- U.S.C.S. Fed. Rules Evid. R 201 (b) (2)
 - Judicial Notice of Adjudicative Facts
 - note + not Presumptions
- 14th - No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States;
- 14th - nor shall any State deprive any person of

15. Constitution Amendment

Legal mail
Exhibit

Pg 2

life, liberty, or property, without due process of law

- 14th - nor deny to any person within its jurisdiction the equal protection of the laws.
- 28 C.F.R. 543.14 - Limitation or denial of attorney visits and correspondence.

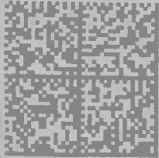
To who it may concern:

Hello. I am having a really hard time understanding all these things you are sending me. I have had to ask a bunch of people in here for help and I still don't know what a lot of it means. The person that helped me start the law suit is gone and there is no other person in here that knows about this stuff. I really need help.

I was also wondering if I could add some Claims to my law suit?

It is also hard for me to do all of this on my own because I am ADA Visually Impaired.

Respectfully
Joshua Omar
Garcia



PITNEY BOWES
\$3.75
US POSTAGE
FIRST-CLASS
026W000487693
266261735
ZIP 8720
JAN 12 2024

Joshua Garcia #B220073
Washington County Justice Center
26861 US HWY 34
Akron, Colorado 80720-9484

Office of the Clerk
United States District Court
901-19th Street, Room A105
Denver, Colorado 80294-3589

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