

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

**FILED**  
UNITED STATES DISTRICT COURT  
DENVER, COLORADO  
**MAR -6 2025**  
JEFFREY P. COLWELL  
CLERK

Civil Action No. 23-CV-03122-PAB-STV  
(To be supplied by the court)

TERANCE DEJUAN WILSON, Plaintiff

v.

Jury Trial requested:  
(please check one)  
 Yes  No

BRANDAN HAGANS,

JASON LINGERICH,

BVCF CAPTAIN ROLLO,

BVCF INTELLIGENCE CAPTAIN DUNLAN, Defendant(s). *(SEE ATTACHED)*

*(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.)*

SECOND AMENDED PLAINTIFF 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.**

ATTACHED: CONTINUED NAMED DEFENDANTS

BVCF INTELLIGENCE LT. DUNCAN,  
BVCF UNIT W/P LT. NOLAN,  
BVCF UNIT W/P LT. LOREY TUCKER,  
BVCF OFFICER (CO) GOINS,  
BVCF OFFICER (CO) AYERS,  
BVCF OFFICER (CO) SUGGS,  
DR. LISA SOULE,

DEFENDANTS.

Free form provided to Wilson #117681 by CDO Legal Services on 12/3/2024

**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.

TERENCE WILSON #117681, P.O. BOX 1600, STERLING, COLORADO 80751  
(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: BRANDAN HAGANS COLORADO DEPT OF CORRECTIONS ("COOC") HEAD INTELLIGENCE  
(Name, job title, and complete mailing address)

OFFICER, COOC HQ, 1850 ACADEMY PARK LOOP, CO. SPRINGS, COLORADO 80910

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:

AT ALL RELEVANT TIMES TO THE SUBJECT MATTER OF THIS COMPLAINT, DEFENDANT BRANDAN HAGANS ACTED IN HIS CAPACITY AS COOC HEADQUARTERS EXCLUSIVE INTELLIGENCE OFFICER.

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

Defendant 2: JASON LINGERICH, WARDEN OF BUENA VISTA CORRECTIONAL FACILITY ("BVCF")  
(Name, job title, and complete mailing address)

P.O. BOX 2017, BUENA VISTA, COLORADO 80211

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:

AT ALL TIMES RELEVANT TO THE SUBJECT MATTER OF THIS COMPLAINT DEFENDANT JASON LINGERICH ACTED IN HIS CAPACITY AS BVCF WARDEN

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

Defendant 3: MR. ROLLO, BVCF CAPTAIN (CHIEF COMMANDER) P.O. Box 2017, BUENA  
(Name, job title, and complete mailing address)

VISTA, COLORADO 80211

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:

AT ALL TIMES RELEVANT TO THE SUBJECT MATTER OF THIS COMPLAINT DEFENDANT ROLLO ACTED IN HIS CAPACITY AS A BVCF CAPTAIN (CHIEF COMMANDER)

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

(SEE ATTACHED: DEFENDANTS INFORMATION)

**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) \_\_\_\_\_

Defendant 2: JASON LINGERICH, WARDEN OF BUENA VISTA CORRECTIONAL FACILITY ("BVCF")  
(Name, job title, and complete mailing address)

P.O. BOX 2017, BUENA VISTA, COLORADO, 80211

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:

AT ALL TIMES RELEVANT TO THE SUBJECT MATTER OF THIS COMPLAINT DEFENDANT JASON LINGERICH ACTED IN HIS CAPACITY AS BVCF WARDEN

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

Defendant 3: MR. ROLLO, BVCF CAPTAIN (SHIFT COMMANDER) P.O. BOX 2017, BUENA  
(Name, job title, and complete mailing address)

VISTA, COLORADO 80211

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:

AT ALL TIMES RELEVANT TO THE SUBJECT MATTER OF THIS COMPLAINT DEFENDANT ROLLO ACTED IN HIS CAPACITY AS A BVCF CAPTAIN (SHIFT COMMANDER)

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

(SEE ATTACHED: DEFENDANTS INFORMATION)

**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) \_\_\_\_\_

#### 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: \_\_\_\_\_

Claim one is asserted against these Defendant(s):

Supporting facts:

A. BACKGROUND ON BVCF LIVING UNIT 6P AND CIVIL RIGHTS CLINIC, UNIVERSITY OF DENVER STURM COLLEGE OF LAW INVESTIGATION INTO UNCONSTITUTIONAL CONDITIONS OF CONFINEMENT.

1. "IN 2020, AFTER RECEIVING MANY CONCERNING REPORTS ABOUT THE CONDITIONS IN THE BVCF ("BUENA VISTA CORRECTIONAL FACILITY") PC ("PROTECTIVE CUSTODY") UNIT, THE UNIVERSITY OF DENVER STURM COLLEGE OF LAW'S CIVIL RIGHTS CLINIC ("CLINIC") BEGAN AN INVESTIGATION INTO THE CONDITIONS. THE CLINIC FOUND THE CONDITIONS IN THE BVCF PC UNIT ("6P") CREATE A DANGEROUS ENVIRONMENT THAT IS HARMFUL TO THE MENTAL HEALTH, EMOTIONAL, AND PHYSICAL HEALTH OF THE PEOPLE WHO LIVE THERE." (BATEY, G.L., AND RESNER, "ABUSED AND FORGOTTEN: LIFE INSIDE THE BVCF PROTECTIVE CUSTODY HALLWAY," CIVIL RIGHTS CLINIC UNIV. OF DENVER STURM COLLEGE OF LAW, JULY 2022, P. 1).
2. DURING THE 2 YEAR INVESTIGATION INTO THE CRUEL AND UNCONSTITUTIONAL CONDITIONS IN THE BVCF PC UNIT ("6P") THE CLINIC'S STUDENT ADVOCATES AND STURM COLLEGE OF LAW'S PROFESSOR AND ADMINISTRATIVE ATTORNEYS COMMUNICATED REGULARLY WITH THE INMATES IN 6P AND LEARNED THAT THEY WERE SUBJECTED TO ONLY: "FOOD CONTAMINATION THAT WAS PURPOSEFULLY TAMPERED WITH BY GENERAL POPULATION ("GP") OFFENDERS AND BVCF STAFF; EXPOSURE TO THE "ELEMENTS" ("WINTER") DUE TO BROKEN AND UNREPAIRED WINDOWS; LIMITED TO NO ACCESS TO REHABILITATIVE PROGRAMMING REQUIRED TO BE PAROLED; LIMITED RECREATION; LACK OF MENTAL HEALTH SERVICES; NO ACCESS TO BVCF'S LAW LIBRARY THAT GP INMATES HAVE REGULAR ACCESS TO; Rampant use of DANGEROUS DRUGS AND HOMEMADE ALCOHOL; AN ATMOSPHERE OF VIOLENCE WHERE FIGHTS, ASSAULTS, STABBINGS, USE AND ACCESS TO WEAPONS WERE NORMAL; LACK OF APPROPRIATE MEDICAL ACCESS AND RESPONSE TO VIOLENT ASSAULTS AND MEDICAL EMERGENCIES; LACK OF ACCESS TO "GRIEVANCES" USED TO SEEK REDRESS WITHIN CDCC FOR CONDITIONS OF CONFINEMENT AND EXHAUSTION OF ADMINISTRATIVE REMEDIES (TO MEET PIRA REQUIREMENTS BEFORE SEEKING REDRESS IN THE COURTS), AND (SEE ATTACHED: COMPLAINT)

( ATTACHED: DEFENDANTS INFORMATION )

DEFENDANT 4: MR. DUNCAN, BUCF INTELLIGENCE CAPTAIN - P.O. BOX 8017, BUENA VISTA, COLORADO, 80811. AT ALL TIMES RELEVANT TO THE SUBJECT MATTER OF THIS COMPLAINT, DEFENDANT CAPT. DUNCAN ACTED UNDER COLOR OF STATE LAW IN HIS CAPACITY AS AN INTELLIGENCE OFFICIAL CAPTAIN AT BUCF. MR. CAPTAIN DUNCAN IS SUED IN HIS INDIVIDUAL CAPACITY.

DEFENDANT 5: MR. DUNCAN, BUCF INTELLIGENT LT - P.O. BOX 8017, BUENA VISTA, COLORADO, 80811. AT ALL TIMES RELEVANT TO THE SUBJECT MATTER OF THIS COMPLAINT, DEFENDANT LT. DUNCAN ACTED UNDER COLOR OF STATE LAW IN HIS CAPACITY AS AN INTELLIGENCE OFFICIAL LT. AT BUCF. MR. DUNCAN IS SUED IN HIS INDIVIDUAL CAPACITY.

DEFENDANT 6: MR. NOLAND, BUCF UNIT 6P LT., P.O. BOX 8017, BUENA VISTA, COLORADO, 80811. AT ALL TIMES RELEVANT TO THE SUBJECT MATTER OF THIS COMPLAINT, DEFENDANT LT. NOLAND ACTED UNDER COLOR OF STATE LAW IN HIS CAPACITY AS AN ~~OFFICIAL~~ OFFICIAL UNIT SUPERVISOR LT. AT BUCF. MR. NOLAND IS SUED IN HIS INDIVIDUAL CAPACITY.

DEFENDANT 7: MR. COREY TUCKER, BUCF 6P UNIT LT., P.O. BOX 8017, BUENA VISTA, COLORADO 80811. AT ALL TIMES RELEVANT TO THE SUBJECT MATTER OF THIS COMPLAINT, DEFENDANT LT. TUCKER ACTED UNDER THE COLOR OF STATE LAW IN HIS CAPACITY AS AN OFFICIAL UNIT SUPERVISOR LT. AT BUCF. MR. TUCKER IS SUED IN HER INDIVIDUAL CAPACITY.

DEFENDANT 8: MS. GOINS, BUCF 6P UNIT CORRECTIONAL OFFICER ("CO"), P.O. BOX 8017, BUENA VISTA, COLORADO, 80811. AT ALL TIMES RELEVANT TO THE SUBJECT MATTER OF THIS COMPLAINT, DEFENDANT CO. GOINS ACTED UNDER THE COLOR OF STATE LAW IN HER CAPACITY AS A CORRECTIONAL OFFICER ("CO") AT BUCF. MS. GOINS IS SUED IN HER INDIVIDUAL CAPACITY.

DEFENDANT 9: MS. AYERS, BUCF 6P UNIT CORRECTIONAL OFFICER ("CO"), P.O. BOX 8017, BUENA VISTA, COLORADO, 80811. AT ALL TIMES RELEVANT TO THE SUBJECT MATTER OF THIS COMPLAINT, DEFENDANT CO. AYERS ACTED UNDER THE COLOR OF STATE LAW IN HER CAPACITY AS A CORRECTIONAL OFFICER ("CO") AT BUCF. AND CO. AYERS IS SUED IN HER INDIVIDUAL CAPACITY.

DEFENDANT 10: MR. SUGGS, BUCF 6P UNIT CORRECTIONAL OFFICER ("CO"), P.O. BOX 8017, BUENA VISTA, COLORADO, 80811. AT ALL TIMES RELEVANT TO THE SUBJECT MATTER OF THIS COMPLAINT, DEFENDANT CO. SUGGS ACTED UNDER COLOR OF STATE LAW IN HIS CAPACITY AS A CORRECTIONAL OFFICER ("CO") AT BUCF, AND IS SUED IN HIS INDIVIDUAL CAPACITY.

DEFENDANT 11: DR. LISA SOULF, BUCF MENTAL HEALTH CLINICIAN, P.O. BOX 8017, BUENA VISTA, CO, 80811. AT ALL TIMES RELEVANT TO THE SUBJECT MATTER OF THIS COMPLAINT, DEFENDANT DR. LISA SOULF WAS ACTING UNDER COLOR OF STATE LAW IN HER CAPACITY AS A MENTAL HEALTH CLINICIAN AT BUCF AND IS SUED IN HER INDIVIDUAL CAPACITY.

( ATTACHED: DEFENDANTS INFORMATION )

- DEFENDANT 4: MR. DUNLAN, BUCF INTELLIGENCE CAPTAIN - P.O. BOX 8017, BUENA VISTA, COLORADO, 80811. AT ALL TIMES RELEVANT TO THE SUBJECT MATTER OF THIS COMPLAINT, DEFENDANT CAPT. DUNLAN ACTED UNDER COLOR OF STATE LAW IN HIS CAPACITY AS AN INTELLIGENCE OFFICIAL CAPTAIN AT BUCF. MR. CAPTAIN DUNLAN IS SUED IN HIS INDIVIDUAL CAPACITY.
- DEFENDANT 5: MR. DUNLAN, BUCF INTELLIGENT LT - P.O. BOX 8017, BUENA VISTA, COLORADO, 80811. AT ALL TIMES RELEVANT TO THE SUBJECT MATTER OF THIS COMPLAINT, DEFENDANT LT. DUNLAN ACTED UNDER COLOR OF STATE LAW IN HIS CAPACITY AS AN INTELLIGENCE OFFICIAL LT. AT BUCF. MR. DUNLAN IS SUED IN HIS INDIVIDUAL CAPACITY.
- DEFENDANT 6: MR. NOLAND, BUCF UNIT 6P LT., P.O. BOX 8017, BUENA VISTA, COLORADO, 80811. AT ALL TIMES RELEVANT TO THE SUBJECT MATTER OF THIS COMPLAINT, DEFENDANT LT. NOLAND ACTED UNDER COLOR OF STATE LAW IN HIS CAPACITY AS AN ~~DEFENDANT~~ OFFICIAL UNIT SUPERVISOR LT. AT BUCF. MR. NOLAND IS SUED IN HIS INDIVIDUAL CAPACITY.
- DEFENDANT 7: MR. COREY TUCKER, BUCF 6P UNIT LT., P.O. BOX 8017, BUENA VISTA, COLORADO 80811. AT ALL TIMES RELEVANT TO THE SUBJECT MATTER OF THIS COMPLAINT, DEFENDANT LT. TUCKER ACTED UNDER THE COLOR OF STATE LAW IN HIS CAPACITY AS AN OFFICIAL UNIT SUPERVISOR LT. AT BUCF. MR. TUCKER IS SUED IN HIS INDIVIDUAL CAPACITY.
- DEFENDANT 8: MRS. GOINS, BUCF 6P UNIT CORRECTIONAL OFFICER ("CO"), P.O. BOX 8017, BUENA VISTA, COLORADO, 80811. AT ALL TIMES RELEVANT TO THE SUBJECT MATTER OF THIS COMPLAINT, DEFENDANT CO. GOINS ACTED UNDER THE COLOR OF STATE LAW IN HER CAPACITY AS A CORRECTIONAL OFFICER ("CO") AT BUCF. MRS. GOINS IS SUED IN HER INDIVIDUAL CAPACITY.
- DEFENDANT 9: MS. AYERS, BUCF 6P UNIT CORRECTIONAL OFFICER ("CO"), P.O. BOX 8017, BUENA VISTA, COLORADO, 80811. AT ALL TIMES RELEVANT TO THE SUBJECT MATTER OF THIS COMPLAINT, DEFENDANT CO. AYERS ACTED UNDER THE COLOR OF STATE LAW IN HER CAPACITY AS A CORRECTIONAL OFFICER ("CO") AT BUCF, AND CO. AYERS IS SUED IN HER INDIVIDUAL CAPACITY.
- DEFENDANT 10: MR. SUGGS, BUCF 6P UNIT CORRECTIONAL OFFICER ("CO"), P.O. BOX 8017, BUENA VISTA, COLORADO, 80811. AT ALL TIMES RELEVANT TO THE SUBJECT MATTER OF THIS COMPLAINT, DEFENDANT CO. SUGGS ACTED UNDER COLOR OF STATE LAW IN HIS CAPACITY AS A CORRECTIONAL OFFICER ("CO") AT BUCF, AND IS SUED IN HIS INDIVIDUAL CAPACITY.
- DEFENDANT 11: DR. LISA SOULÉ, BUCF MENTAL HEALTH CLINICIAN, P.O. BOX 8017, BUENA VISTA, CO, 80811. AT ALL TIMES RELEVANT TO THE SUBJECT MATTER OF THIS COMPLAINT, DEFENDANT DR. LISA SOULÉ WAS ACTING UNDER COLOR OF STATE LAW IN HER CAPACITY AS A MENTAL HEALTH CLINICIAN AT BUCF AND IS SUED IN HER INDIVIDUAL CAPACITY.

INSTITUTIONAL REDRISH / RETALIATION AGAINST LP OFFENDERS WHO ATTEMPT TO EXHAUST ADMINISTRATIVE REMEDIES; AND THE ARBITRARY REMOVAL OF LP PC OFFENDERS FROM PROTECTIVE CUSTODY SO THEY ARE TRANSFERRED TO THE MOST DANGEROUS PRISON IN COLORADO ("COLORADO STATE PENITENTIARY, OR CSP") WHERE THE FORMER PC OFFENDER WILL BE SUBJECTED TO IMMEDIATE AND BRUTAL ASSAULTS - MURDER ATTEMPTS - BY OTHER NON-FORMER PC INMATES.

3. DURING THE 2 YEAR INVESTIGATION INTO BULF PC UNIT LP THE CLINIC ATTORNEYS ATTEMPTED TO ADVOCATE FOR CHANGES TO IMPROVE THE UNCONSTITUTIONAL CONDITIONS OF CONFINEMENT AT BULF PC UNIT LP, HOWEVER THEY WERE MET WITH RESISTANCE AND IGNORED BY HIGH RANKING COOL OFFICIALS WHO COULD IMPLEMENT IMMEDIATE REFORMS SUCH AS: COOL EXECUTIVE DIRECTORS, COOL HEAD OF PRISON INTELLIGENCE OFFICIAL BRANDON HAGANS, AND BULF WARDEN JASON LINDBERGH.
4. IN FACT, DURING THIS 2 YEAR INVESTIGATION THE CLINIC SOONLY DISCOVERED THAT NEARLY ALL THE LP OFFENDERS WHO INITIALLY CO-OPERATED WITH THE INVESTIGATION SINCE 2020, AND WHO HAD EXHAUSTED ADMINISTRATIVE REMEDIES CONCERNING THE AFOREMENTIONED UNCONSTITUTIONAL CONDITIONS OF CONFINEMENT WOULD BE REMOVED FROM BULF PC UNIT LP, ARBITRARILY ON FALSE OR TRUMPED UP DISCIPLINARY CHARGES, AND TRANSFERRED TO THE VICIOUS GENERAL POPULATION ONLY TO BE URGENTLY VICTIMIZED FOR SPEAKING OUT. THIS AMOUNTED TO APPROXIMATELY 30 LP OFFENDERS.
5. INDEED, THIS EFFORT TO MAKE ANY AND ALL POTENTIAL LEGAL REDRESS IN THE COURTS BY THESE APPROX. 30 LP OFFENDER AND THE CLINIC ATTORNEYS "MOT", THIS MAINTAIN THE STATUS AND AND UNCONSTITUTIONAL CONDITIONS BEGAN AFTER THE APRIL 5TH 2021 MEETING BETWEEN HIGH RANKING COOL OFFICIALS, ATTORNEYS FROM THE ATTORNEY GENERAL'S OFFICE UNDER LEADERSHIP OF PHIL WEISER, AND THE CLINIC ATTORNEYS. AFTER THE CLINIC ATTORNEYS REVEALED THE PROBLEMS DISCOVERED WITH BULF PC UNIT LP, THE COOL OFFICIALS, INCLUDING BRANDON HAGANS, AND THE AG OFFICE ATTORNEY REQUESTED THE IDENTITIES OF THE LP OFFENDERS AND WHICH ISSUES, CONDITIONS OF CONFINEMENT THEY REPORTED. CLINIC ATTORNEYS DID NOT REVEAL ANYTHING CONCERNING THE IDENTITIES AT THAT MOMENT, BUT THE COOL OFFICIALS AND AG OFFICE ATTORNEY STATED THAT THEY REQUIRED THIS INFORMATION WITH THE PROMISE OF IMPROVING CONDITIONS COMPLETELY DEPENDANT UPON KNOWING WHO REPORTED WHAT. SOON THEREAFTER, CLINIC ATTORNEYS INFORMED ALL THE CO-OPERATING LP OFFENDERS OF THE NEED TO REVEAL THEIR IDENTITIES AND CLAIMS TO COOL OFFICIALS AND THE AG OFFICE TO IMPROVE CONDITIONS AND PROVIDED THEM WITH "WAIVERS OF CONFIDENTIALITY" TO SIGN SO THE CLINIC ATTORNEYS COULD DIVULGE REQUESTED INFORMATION. ONCE LP OFFENDERS COMPLIED TO COOL'S AND THE AG OFFICE'S REQUEST, SIGNED THE WAIVERS, THEY WERE THEN SYSTEMATICALLY REMOVED FROM BULF PC UNIT LP BY OFFICIAL APPOINTMENT FROM BRANDON HAGANS AND BULF WARDEN JASON LINDBERGH.
6. AFTER THE REMOVAL OF LP OFFENDERS FROM BULF PC UNIT THE CLINIC ATTORNEYS WERE FORCED TO COMMUNICATE WITH NEWLY ARRIVING OFFENDERS AT BULF PC UNIT AND ULTIMATELY RELEASE THEIR OFFICIAL REPORT OF THE INVESTIGATION ON JULY 2021: "ABUSED AND FORGOTTEN: LIFE INSIDE THE BULF PROTECTIVE CUSTODY HALLWAY", AND SENT IT TO COOL OFFICIALS AT HEADQUARTERS, INCLUDING BRANDON HAGANS, AND BULF WARDEN JASON LINDBERGH, AND TO SEVERAL LEGISLATURES AND REPRESENTATIVES FOR THE STATE OF COLORADO, THE GOV. JARED POLIS, AND ATTORNEY GENERAL PHIL WEISER.
7. THEREFORE, ALL OF THE AFOREMENTION UNCONSTITUTIONAL CONDITIONS OF CONFINEMENT WERE LONG-STANDING AND BRANDON HAGANS AND JASON LINDBERGH WERE NOT ONLY AWARE OF THEM BUT INSIDIOUSLY WORKED TO THWART ANY ATTEMPT TO IMPROVE SAID CONDITIONS LP OFFENDERS WERE SUBJECTED TOO.

(ATTACHED: COMPLAINT PG. 1 OF 11)

- B. MID-JUNE 2023: MR. WILSON REPORTS SEXUAL VICTIMIZATION AND VIOLENT THREATS FROM OFFENDER ERNEST JONES AT BULF PC UNIT 6P.
8. ON OR ABOUT JUNE 14TH 2023, MR. WILSON WAS HOUSED AT BUENA VISTA CORRECTIONAL FACILITY ("BUCF") PROTECTIVE CUSTODY ("PC") UNIT 6P.
  9. THAT DAY ANOTHER OFFENDER, ERNEST JONES, WAS ALSO HOUSED AT BULF PC UNIT 6P, AND MR. JONES HAD BEEN EXPOSING AND MASTERBATING HIS ERECT PENIS IN FRONT OF MR. WILSON, OTHER OFFENDERS, AND BULF CORRECTIONAL OFFICERS ("CO'S") AND STAFF, EVEN EJACULATING IN PLAIN VIEW OF EVERYONE SEVERAL TIMES PER DAY.
  10. MR. WILSON, SEVERAL OTHER BULF PC OFFENDERS, AND BULF CORRECTIONAL STAFF REPEATEDLY REQUESTED MR. JONES' SEXUAL MISCONDUCT AND WIDESPREAD VICTIMIZATION TO BULF OFFICIALS: WARDEN DEFENDANT JASON LINDBERGH, DEFENDANT JATEL CAPT. DUNCAN, DEFENDANT JATEL LT. DUNCAN, DEFENDANT SHIFT COMMANDER CAPT. ROLLO, DEFENDANT LT. NOLAN, DEFENDANT LT. TUCKER. HOWEVER THESE BULF OFFICIALS TOOK NO ACTIONS TO PROTECT MR. WILSON, OTHER OFFENDERS, OR STAFF FROM MR. JONES' SEXUAL VICTIMIZATION.
  11. THAT DAY AT APPROX. 1:00 PM MR. JONES LURED MR. WILSON INTO MR. JONES CELL, THEN PULLED OUT A HOMEMADE METAL SHANK AND PLACED IT TO MR. WILSON'S THROAT AND STATED: "YOU MOTHERFUCKER I COULD KILL YOU RIGHT NOW!"
  12. CONFUSED, MR. WILSON ASKED MR. JONES WHY HE WAS HOLDING THE SHANK TO HIS NECK. MR. JONES RESPONDED: "I SPOKE TO CO BOINS AND CO AYERS, AND THEY TOLD ME THAT YOU HAVE BEEN SWITCHING ON ME. THEN I SPOKE TO LT. NOLAN AND HE ALSO SAID YOU WERE SWITCHING ON ME. NOLAN TOLD ME YOU EVEN REPORTED ME SELLING DRUGS! SO TELL ME WHY I SHOULDN'T KILL YOU?"
  13. MR. WILSON DENIED THAT HE HAD REPORTED MR. JONES FOR HIS SEXUAL MISCONDUCT AND SELLING DRUGS, FOR HIS LIFE DEPENDS UPON IT, AND MR. WILSON SAID THAT THEY WERE LYING TO MR. JONES.
  14. MR. JONES WITHDREW THE METAL SHANK FROM MR. WILSON'S NECK, WHICH MR. WILSON SAW WERE A PAIR OF SHARPENED METAL SCISSORS, THEN MR. JONES THREATENED: "IF I FIND OUT YOU ARE SWITCHING ON ME, I WILL KILL YOU!" AND ALLOWED MR. WILSON TO LEAVE THE CELL.
  15. MR. WILSON FEARED THAT IF HE REPORTED THAT MR. JONES HAD PLACED THE SHARPENED SCISSORS TO HIS THROAT, HARD ENOUGH TO DRAW BLOOD AND CUT MR. WILSON, TO THE OFFICERS WORKING AT BULF PC UNIT 6P THAT DAY, THAT THEY MAY RELAY THIS INFORMATION TO MR. JONES, WHICH WOULD RESULT IN MR. JONES ATTEMPTING TO KILL MR. WILSON.
  16. MR. WILSON FELT HE NEED TO REPORT MR. JONES SEXUAL MISCONDUCT AND THREATS TO KILL TO SOMEONE OUTSIDE OF BULF IN HOPES THAT SOMEONE WOULD PROTECT HIM. THEREFORE, MR. WILSON CALLED, ON THE BULF UNIT PHONE, THE NATIONAL PRISON RAPE ELIMINATION ACT ("PREA") HOTLINE, AND THE COLORADO DEPT. OF CORRECTIONS ("CDC") "CRIME TIPS" HOTLINE TO REPORT THAT MR. WILSON WAS IN FEAR FOR HIS SAFETY FROM MR. JONES, WHO WAS EXPOSING AND MASTERBATING HIS ERECT PENIS UNTIL EJACULATION IN FRONT OF MR. WILSON, OTHER BULF PC 6P OFFENDERS, AND CDC STAFF; AND HAD JUST PLACED A PAIR OF SHARPENED METAL SCISSORS TO HIS THROAT, DRAWING BLOOD, AND THREATENED TO MURDER MR. WILSON FOR "SWITCHING" - REPORTING - MR. JONES SEXUAL MISCONDUCT.
  17. AT APPROXIMATELY 3:00 PM THAT SAME DAY, MR. WILSON COMPLETED THE REPORTS OF MR. JONES' SEXUAL MISCONDUCT, POSSESSION OF A DANGEROUS WEAPON (I.E. SHARPENED METAL SCISSORS), AND THE THREAT TO INVADER MR. WILSON IF MR. JONES DISCOVERED HE HAD SWITCHED TO THE PREA HOTLINE AND THE CDC CRIME TIPS LINE.
  18. WHILE MR. WILSON WAS MAKING HIS REPORT TO THE PREA HOTLINE, AN EMPLOYEE FOR THE PREA

(ATTACHED: COMPLAINT PG 2 of 11)

- B. MID-JUNE 2023: MR. WILSON REPORTS SEXUAL VICTIMIZATION AND VIOLENT THREATS FROM OFFENDER ERNEST JONES AT BULF PC UNIT LP.
8. ON OR ABOUT JUNE 14TH 2023, MR. WILSON WAS HOUSED AT BUENA VISTA CORRECTIONAL FACILITY ("BULF") PROTECTIVE CUSTODY ("PC") UNIT LP.
  9. THAT DAY ANOTHER OFFENDER, ERNEST JONES, WAS ALSO HOUSED AT BULF PC UNIT LP, AND MR. JONES HAD BEEN EXPOSING AND MASTERBATING HIS ERECT PENIS IN FRONT OF MR. WILSON, OTHER OFFENDERS, AND BULF CORRECTIONAL OFFICERS ("CO'S") AND STAFF, EVEN EJACULATING IN PLAIN VIEW OF EVERYONE SEVERAL TIMES PER DAY.
  10. MR. WILSON, SEVERAL OTHER BULF PC OFFENDERS, AND BULF CORRECTIONAL STAFF REPEATEDLY REPORTED MR. JONES' SEXUAL MISCONDUCT AND WIDESPREAD VICTIMIZATION TO BULF OFFICIALS: WARDEN DEFENDANT JASON LINDBERGH, DEFENDANT INTEL CAPT. DUNNAN, DEFENDANT INTEL LT. DUNNAN, DEFENDANT SHIPT COMMANDER CAPT. ROLLO, DEFENDANT LT. NOLAN, DEFENDANT LT. TUCKER. HOWEVER THESE BULF OFFICIALS TOOK NO ACTIONS TO PROTECT MR. WILSON, OTHER OFFENDERS, OR STAFF FROM MR. JONES' SEXUAL VICTIMIZATION.
  11. THAT DAY AT APPROX. 1:00 PM MR. JONES LURED MR. WILSON INTO MR. JONES CELL, THEN PULLED OUT A HOMEMADE METAL SHANK AND PLACED IT TO MR. WILSON'S THROAT AND STATED: "YOU MOTHERFUCKER I COULD KILL YOU RIGHT NOW!"
  12. CONFUSED, MR. WILSON ASKED MR. JONES WHY HE WAS HOLDING THE SHANK TO HIS NECK. MR. JONES RESPONDED: "I SPOKE TO CO GOINS AND CO AYERS, AND THEY TOLD ME THAT YOU HAVE BEEN SWITCHING ON ME. THEN I SPOKE TO LT. NOLAN AND HE ALSO SAID YOU WERE SWITCHING ON ME. NOLAN TOLD ME YOU EVEN REBATED ME SELLING DRUGS! SO TELL ME WHY I SHOULDN'T KILL YOU?"
  13. MR. WILSON DENIED THAT HE HAD REPORTED MR. JONES FOR HIS SEXUAL MISCONDUCT AND SELLING DRUGS, FOR HIS LIFE DEPENDS UPON IT, AND MR. WILSON SAID THAT THEY WERE LYING TO MR. JONES.
  14. MR. JONES WITHDREW THE METAL SHANK FROM MR. WILSON'S NECK, WHICH MR. WILSON SAW WERE A PAIR OF SHARPENED METAL SCISSORS, THEN MR. JONES THREATENED: "IF I FIND OUT YOU ARE SWITCHING ON ME, I WILL KILL YOU!" AND ALLOWED MR. WILSON TO LEAVE THE CELL.
  15. MR. WILSON FEARED THAT IF HE REPORTED THAT MR. JONES HAD PLACED THE SHARPENED SCISSORS TO HIS THROAT, HARD ENOUGH TO DRAW BLOOD AND CUT MR. WILSON, TO THE OFFICERS WORKING AT BULF PC UNIT LP THAT DAY, THAT THEY MIGHT RELAY THIS INFORMATION TO MR. JONES, WHICH WOULD RESULT IN MR. JONES ATTEMPTING TO KILL MR. WILSON.
  16. MR. WILSON FELT HE NEED TO REPORT MR. JONES SEXUAL MISCONDUCT AND THREATS TO KILL TO SOMEONE OUTSIDE OF BULF IN HOPES THAT SOMEONE WOULD PROTECT HIM. THEREFORE MR. WILSON CALLED, ON THE BULF UNIT PHONE, THE NATIONAL PRISON RAPE ELIMINATION ACT ("PREP") HOTLINE, AND THE COLORADO DEPT. OF CORRECTIONS ("CODC") "CRIME TIPS" HOTLINE TO REPORT THAT MR. WILSON WAS IN FEAR FOR HIS SAFETY FROM MR. JONES, WHO WAS EXPOSING AND MASTERBATING HIS ERECT PENIS UNTIL EJACULATION IN FRONT OF MR. WILSON, OTHER BULF PC LP OFFENDERS, AND CODC STAFF, AND HAD JUST PLACED A PAIR OF SHARPENED METAL SCISSORS TO HIS THROAT, DRAWING BLOOD, AND THREATENED TO MURDER MR. WILSON FOR "SWITCHING" - REPORTING - MR. JONES SEXUAL MISCONDUCT.
  17. AT APPROXIMATELY 3:00 PM THAT SAME DAY, MR. WILSON COMPLETED THE REPORTS OF MR. JONES' SEXUAL MISCONDUCT, POSSESSION OF A DANGEROUS WEAPON (IE, SHARPENED METAL SCISSORS), AND THE THREAT TO MURDER MR. WILSON IF MR. JONES DISCOVERED HE HAD SWITCHED TO THE PREP HOTLINE AND THE CODC CRIMES TIPS LINE.
  18. WHILE MR. WILSON WAS MAKING HIS REPORT TO THE PREP HOTLINE, AN EMPLOYEE FOR THE PREP (ATTACHED: COMPLAINT PG 2 of 11)

- HOTLINE WAS ELECTRONICALLY RECORDED THE AUDIO OF THE PHONE CALL - IN REAL TIME - AND WAS CREATING A TYPED REPORT THAT DOCUMENTED MR. WILSON'S REPORT OF MR. JONES' ONLY SEXUAL MISCONDUCT, POSSESSION OF A DANGEROUS WEAPON (I.E. SHARPENED METAL SCISSORS), AND MR. JONES PRESSING THE SHARPENED SCISSORS TO MR. WILSON'S NECK - CUTTING THE SKIN AND DRAWING BLOOD - AS MR. JONES THREATENED TO KILL MR. WILSON IF HE LEARNED MR. WILSON HAD REPORTED ("SWITCHED") ON MR. JONES PREDATORY AND DANGEROUS MISCONDUCT.
19. SIMILARLY, MR. WILSON'S PHONECALL TO THE COOC "CRIME TIPS" HOTLINE, REPORTING MR. JONES' SEXUAL MISCONDUCT, POSSESSION OF A DANGEROUS WEAPON, AND THAT MR. JONES PRESSING SHARPENED SCISSORS TO MR. WILSON'S NECK AS MR. JONES THREATENED TO KILL MR. WILSON IF MR. JONES FOUND OUT THAT MR. WILSON REPORTED ("SWITCHED") ON MR. JONES, WAS ELECTRONICALLY RECORDED.
  20. FOR BOTH THE PRAA HOTLINE AND THE COOC CRIME TIPS HOTLINE AN AUTOMATIC AND MANDATORY REPORTING PROTOCOL IS IMMEDIATELY INITIATED THE MOMENT MR. WILSON HUNG UP THE PHONE. THEREFORE, "ALERTS" IN THE FORM OF INFORMATIVE EMAILS WOULD IMMEDIATELY BE SENT COOC HEADQUARTERS ("HQ") SPECIFICALLY DEFENDANT BRANDAN HAGANS, WHO IS THE TOP INTELLIGENCE OFFICER WITHIN COOC AND OVERSEES ALL COOC INTELLIGENCE OFFICIALS IN COLORADO'S PRISONS, AND TO THE TOP OFFICIALS AT BUCF WHERE MR. WILSON IS HOUSED, SPECIFICALLY DEFENDANTS BUCF WARDEN JERAM LINGERICH, BUCF INTELLIGENCE CAPT. DUNCAN, AND BUCF INTELLIGENCE LT. DUNCAN.
  21. TO ENSURE ALL CRITICAL COOC OFFICIALS (WHO ARE RESPONSIBLE FOR THE SAFETY AND SECURITY OF COOC FACILITIES, THE COOC AND OFFENDERS WITHIN COOC FACILITIES) HAVE THE ABILITY TO BE CONTACTED QUICKLY, EVEN OFF DUTY, AND BRIEFED OF ANY POTENTIAL SAFETY ISSUE, THE STATE OF COLORADO ISSUES ALL CRITICAL COOC OFFICIALS "SMART PHONES" THAT HAVE THE ABILITY TO SEND AND RECEIVE EMAILS, TEXT MESSAGES, AND PHONECALLS. THUS, MR. WILSON'S REPORTS TO THE PRAA HOTLINE AND COOC CRIME TIPS HOTLINE (CONCERNING MR. JONES SEXUALLY PREDATORY AND VIOLENT, THREATENING BEHAVIOR) WOULD HAVE QUICKLY SHOWN UP ON DEFENDANTS HAGANS, LINGERICH, CAPT. DUNCAN, AND LT. DUNCAN'S STATE ISSUED SMART PHONES AND ALERTED THEM TO THE IMMEDIATE THREAT TO MR. WILSON'S SAFETY FROM MR. JONES.
  22. UPON RECEIVING THIS ALERT THAT NOTIFIED DEFENDANTS HAGANS, LINGERICH, CAPT. DUNCAN, AND LT. DUNCAN OF THE IMMEDIATE THREAT TO MR. WILSON'S SAFETY FROM MR. JONES, ONLY MOMENTS AFTER MR. WILSON HUNG UP THE PHONE, AFTER MAKING REPORTS TO THE PRAA HOTLINE AND COOC "TIPS" HOTLINE, WERE SUPPOSED TO IMMEDIATELY SEND EMAILS, TEXTS AND PHONECALLS DIRECTLY TO THE BUCF SHIFT COMMANDERS, UNIT LTS, AND BUCF STAFF TO IMMEDIATELY INVESTIGATE MR. WILSON'S REPORTS AND ENSURE HIS SAFETY.
  23. UPON RECEIVING THE INFORMATION THAT MR. WILSON'S SAFETY WAS PLACED AT-RISK BY MR. JONES DEFENDANTS HAGANS, LINGERICH, CAPT. DUNCAN, AND LT. DUNCAN WERE TO ENTER INTO THE DCIS ("COOC'S DATABASE SYSTEM") A "CUSTODY ISSUE" REPORT - WHICH DOCUMENTS ANY THREAT TO A COOC INMATE'S SAFETY, SUCH THAT THE TWO INMATES CAN NOT BE HOUSED TOGETHER - AS PER COOC ADMINISTRATIVE REGULATION #600-01 III.C.
  24. THE DCIS ALSO LISTS EVERY INMATE'S GANG AFFILIATION, CRIMINAL HISTORY, AND HISTORY OF OFFENSES COMMITTED BY THE INMATE WITHIN THE COOC SYSTEM.
  25. THE DCIS IS ACCESSIBLE BY THE COOC EXECUTIVE DIRECTOR, ALL PRISON WARDENS, ASSOCIATE WARDENS, CASE MANAGERS, INTELLIGENCE OFFICERS, INTERNAL CLASSIFICATION COMMITTEE MEMBERS, SHIFT COMMANDERS, POB SUPERVISORS, AND CORRECTIONAL OFFICERS IN EVERY FACILITY IN THE COOC SYSTEM.
  26. UNDER COOC A.R. #600-01 IV. D. AND USD-02 II.C. DEFENDANTS HAGANS, LINGERICH, CAPT. DUNCAN, AND LT. DUNCAN HAD THE AUTHORITY AND THE RESPONSIBILITY TO TEMPORARILY REMOVE MR. WILSON FROM THE INMATE POPULATION AT BUCF TO ENSURE HIS SAFETY UNTIL THE INVESTIGATION AND REVIEW PROCESS WAS COMPLETED BECAUSE THERE WAS A "POTENTIAL OF SIGNIFICANT RISK" TO MR. WILSON'S SAFETY FROM MR. JONES.

(ATTACHED: COMPLAINT PG 3 OF 11)

27. UNDER COOL A.R. #600-01 III.M., DEFENDANTS HAGANS, LINGERICH, CAPT. DUNCAN, AND LT. DUNCAN HAD THE AUTHORITY AND RESPONSIBILITY TO INITIATE THE CUSTODY ISSUE VALIDATION PROCESS AND SUBMITTING A 'CUSTODY ISSUE STATEMENT' REPORTING MR. WILSON'S SAFETY CONCERNS FROM MR. JONES, THUS ENSURING MR. WILSON AND MR. JONES AND THE TWO INMATES WOULD NOT BE HOUSED TOGETHER, ~~AND~~ FORTHWITH.
28. UNDER COOL A.R. #100-07, DEFENDANTS HAGANS, LINGERICH, CAPT. DUNCAN, AND LT. DUNCAN WERE REQUIRED TO SUBMIT AN INCIDENT REPORT FOR MR. WILSON BEING LURED INTO A CELL BY MR. JONES, WHO HELD A SHARP PAIR OF SCISSORS TO MR. WILSON'S NECK AND THREATENED TO KILL MR. WILSON IF HE LEARNED HE HAD REPORTED MR. JONES DAILY SEXUAL MISCONDUCT, THAT THEY WOULD BE PLACED INTO THE PCDCIS SYSTEM, AS THEY CONSTITUTED "REPORTABLE INCIDENTS" UNDER COOL A.R. #100-07 III. R.
29. DEFENDANTS HAGANS, LINGERICH, CAPTAIN DUNCAN, AND LT. DUNCAN VIOLATED COOL A.R. #100-07, #600-01, AND #650-02, BY FAILING TO (I) SUBMIT AN INCIDENT REPORT REGARDING MR. WILSON'S SAFETY CONCERNS, (II) INITIATE THE CUSTODY ISSUE VALIDATION PROCESS, OR (III) TAKE ANY STEPS TO TEMPORARILY REMOVE HIM FROM THE BULF INMATE POPULATION
30. DEFENDANTS HAGANS, LINGERICH, CAPT. DUNCAN, AND LT. DUNCAN'S FAILURE TO FOLLOW ESTABLISHED COOL POLICY TO TAKE ANY REASONABLE MEASURES TO ENSURE MR. WILSON'S SAFETY AFTER RECEIVING INFORMATION FROM THE PREA HOTLINE AND COOL "TIPS" HOTLINE EXPOSED MR. WILSON TO THE KNOWN EXTREME RISK OF SERIOUS HARM AT THE HANDS OF ANOTHER OFFENDER - WHICH ULTIMATELY RESULTED IN MR. WILSON BEING STABBED 11 TIMES BY MR. JONES ON JULY 1ST, 2003.
- D. MR. WILSON WRITES TO DEFENDANTS CAPT. DUNCAN, LT. DUNCAN, CAPT. ROLLO AND LT. NOLAN ON OR ABOUT JUNE 17TH 2003 TO REPORT THE THREATS FROM MR. JONES.
31. ON OR ABOUT JUNE 17TH 2003, AFTER MR. WILSON WAS NOT REMOVED FROM THE BULF INMATE POPULATION AND NO OFFICIALS CAME TO SPEAK TO HIM CONCERNING HIS REPORTS TO THE PREA HOTLINE AND COOL "TIPS" HOTLINE, MR. WILSON WROTE INDIVIDUAL REPORTS TO DEFENDANT CAPT. DUNCAN, LT. DUNCAN, CAPT. ROLLO, LT. NOLAN, AND LINGERICH THAT DETAILED HOW MR. JONES WAS DAILY, EXPOSING AND IMPOSTERBATING HIS PREET PENIS IN FRONT OF HIM, OTHER INMATES AND BULF STAFF AND HOW MR. JONES LURED MR. WILSON INTO A CELL, PRESSED A PAIR OF SHARPENED SCISSORS TO HIS NECK, AND TOLD HIM CO. BOGGS AND CO. AYERS TOLD HIM THAT WILSON HAD REPORTED MR. JONES SEXUAL MISCONDUCT - WHICH MR. WILSON DENIED FOR HIS LIFE DEPENDED UPON IT - AND MR. JONES' THREAT TO KILL HIM IF MR. JONES LEARNED MR. WILSON REPORTED HIM. ALSO MR. WILSON WROTE THAT THE DAY PRIOR HE CALLED BOTH THE PREA HOTLINE AND COOL "TIPS" HOTLINE TO REPORT MR. JONES' PREDATORY SEXUAL MISCONDUCT AND IMMINENT RISK TO HIS SAFETY, AND REQUESTED TO BE MOVED OUT OF BULF FOR HIS OWN SAFETY.
32. UPON RECEIVING THESE WRITTEN REPORTS FROM MR. WILSON DEFENDANTS LINGERICH, CAPTAIN DUNCAN, LT. DUNCAN, CAPT. ROLLO, AND LT. NOLAN WERE TO IMMEDIATELY ENTER INTO THE OGIS DATABASE A CUSTODY ISSUE REPORT, DOCUMENTING THE THREAT MR. JONES POSED TO MR. WILSON SAFETY TO ENSURE THE TWO INMATES CAN NOT BE HOUSED TOGETHER, AS PER COOL A.R. #600-01 III.C. AND #600-01 III.M.
33. UPON RECEIVING THESE WRITTEN REPORTS FROM MR. WILSON DEFENDANTS LINGERICH, CAPT. DUNCAN, LT. DUNCAN, CAPT. ROLLO, AND LT. NOLAN WERE REQUIRED BY COOL A.R. #100-07 TO SUBMIT AN INCIDENT REPORT FOR MR. WILSON'S REPORT OF MR. JONES SEXUAL MISCONDUCT, AND THREATS TO MR. WILSON'S SAFETY, AS IT CONSTITUTED "REPORTABLE INCIDENTS" UNDER COOL A.R. #100-07 III.R.
34. UPON RECEIVING THESE WRITTEN REPORTS FROM MR. WILSON DEFENDANTS LINGERICH, CAPT. DUNCAN, CAPT. ROLLO, LT. DUNCAN, AND LT. NOLAN WERE REQUIRED BY COOL A.R. #600-01 III.D. AND #650-02 III.C. TO AND HAD THE AUTHORITY TO TEMPORARILY REMOVE MR. WILSON FROM THE BULF INMATE POPULATION TO ENSURE HIS SAFETY UNTIL THE INVESTIGATION AND REVIEW PROCESS WAS COMPLETED BECAUSE THERE WAS A "POTENTIAL OF SIGNIFICANT RISK" TO MR. WILSON'S SAFETY FROM MR. JONES.

(ATTACHED: COMPLAINT PG 4 OF 11 )

27. UNDER COOL A.R. #600-01 III.M., DEFENDANTS HAGANS, LINGERICH, CAPT. DUNCAN, AND LT. DUNCAN HAD THE AUTHORITY AND RESPONSIBILITY TO INITIATE THE CUSTODY ISSUE VALIDATION PROCESS AND SUBMITTING A "CUSTODY ISSUE STATEMENT REGARDING MR. WILSON'S SAFETY CONCERNS FROM MR. JONES, THUS ENSURING MR. WILSON AND MR. JONES AND THE TWO INMATES WOULD NOT BE HOUSED TOGETHER, ~~AND~~ FORTHWITH.

28. UNDER COOL A.R. #100-07, DEFENDANTS HAGANS, LINGERICH, CAPT. DUNCAN, AND LT. DUNCAN WERE REQUIRED TO SUBMIT AN INCIDENT REPORT FOR MR. WILSON BEING LURED INTO A CELL BY MR. JONES, WHO HELD A SHARP PAIR OF SCISSORS TO MR. WILSON'S NECK AND THREATENED TO KILL MR. WILSON IF HE LEARNED HE HAD REPORTED MR. JONES ONLY SEXUAL MISCONDUCT, THAT THEN WOULD BE PLACED IN TO THE PCDCIS SYSTEM, AS THEY CONSTITUTED "REPORTABLE INCIDENTS" UNDER COOL A.R. #100-07 III. R.

29. DEFENDANTS HAGANS, LINGERICH, CAPTAIN DUNCAN, AND LT. DUNCAN VIOLATED COOL A.R. #100-07, #600-01, AND #650-02, BY FAILING TO (I) SUBMIT AN INCIDENT REPORT REGARDING MR. WILSON'S SAFETY CONCERNS, (II) INITIATE THE CUSTODY ISSUE VALIDATION PROCESS, OR (III) TAKE ANY STEPS TO TEMPORARILY REMOVE HIM FROM THE BULF INMATE POPULATION

30. DEFENDANTS HAGANS, LINGERICH, CAPT. DUNCAN, AND LT. DUNCAN'S FAILURE TO FOLLOW ESTABLISHED COOL POLICY TO TAKE ANY REASONABLE MEASURES TO ENSURE MR. WILSON'S SAFETY AFTER RECEIVING INFORMATION FROM THE PREA HOTLINE AND COOL "TIPS" HOTLINE EXPOSED MR. WILSON TO THE KNOWN EXTREME RISK OF SERIOUS HARM AT THE HANDS OF ANOTHER OFFENDER - WHICH ULTIMATELY RESULTED IN MR. WILSON BEING STRIPPED 11 TIMES BY MR. JONES ON JULY 1ST, 2003.

D. MR. WILSON WRITES TO DEFENDANTS CAPT. DUNCAN, LT. DUNCAN, CAPT. ROLLO AND LT. NOLAN ON OR ABOUT JUNE 17TH 2003 TO REPORT THE THREATS FROM MR. JONES.

31. ON OR ABOUT JUNE 17TH 2003, AFTER MR. WILSON WAS NOT REMOVED FROM THE BULF INMATE POPULATION AND NO OFFICIALS CAME TO SPEAK TO HIM CONCERNING HIS REPORTS TO THE PREA HOTLINE AND COOL "TIPS" HOTLINE, MR. WILSON WROTE INDIVIDUAL REPORTS TO DEFENDANT CAPT. DUNCAN, LT. DUNCAN, CAPT. ROLLO, LT. NOLAN, AND LINGERICH THAT DETAILED HOW MR. JONES WAS DAILY, FRAPING AND MASTURBATING HIS FREE PENIS IN FRONT OF HIM, OTHER INMATES AND BULF STAFF TO HIS NECK, AND TOLD HIM CO. GOINS AND CO. AYERS TOLD HIM THAT WILSON HAD REPORTED MR. JONES SEXUAL MISCONDUCT - WHICH MR. WILSON DENIED FOR HIS LIFE DEPENDED UPON IT - AND MR. JONES' THREAT TO KILL HIM IF MR. JONES LEARNED MR. WILSON REPORTED HIM. ALSO MR. WILSON WROTE THAT THE DAY PRIOR HE CALLED BOTH THE PREA HOTLINE AND COOL "TIPS" HOTLINE TO REPORT MR. JONES' PREDATORY SEXUAL MISCONDUCT AND IMMINENT RISK TO HIS SAFETY, AND REQUESTED TO BE MOVED OUT OF BULF FOR HIS OWN SAFETY.

32. UPON RECEIVING THESE WRITTEN REPORTS FROM MR. WILSON DEFENDANTS LINGERICH, CAPTAIN DUNCAN, LT. DUNCAN, CAPT. ROLLO, AND LT. NOLAN WERE TO IMMEDIATELY ENTER INTO THE OLIS DATABASE A CUSTODY ISSUE REPORT, DOCUMENTING THE THREAT MR. JONES POSED TO MR. WILSON SAFETY TO ENSURE THE TWO INMATES CAN NOT BE HOUSED TOGETHER, AS PER COOL A.R. #600-01 III.C. AND #600-01 III.M.

33. UPON RECEIVING THESE WRITTEN REPORTS FROM MR. WILSON DEFENDANTS LINGERICH, CAPT. DUNCAN, LT. DUNCAN, CAPT. ROLLO, AND LT. NOLAN WERE REQUIRED BY COOL A.R. #100-07 TO SUBMIT AN INCIDENT REPORT FOR MR. WILSON'S REPORT OF MR. JONES SEXUAL MISCONDUCT, AND THREATS TO MR. WILSON'S SAFETY, AS IT CONSTITUTED "REPORTABLE INCIDENTS" UNDER COOL A.R. #100-07 III.R.

34. UPON RECEIVING THESE WRITTEN REPORTS FROM MR. WILSON DEFENDANTS LINGERICH, CAPT. DUNCAN, CAPT. ROLLO, LT. DUNCAN, AND LT. NOLAN WERE REQUIRED BY COOL A.R. #600-01 III.C. AND #650-02 III.C. TO AND HAD THE AUTHORITY TO TEMPORARILY REMOVE MR. WILSON FROM THE BULF INMATE POPULATION TO ENSURE HIS SAFETY UNTIL THE INVESTIGATION AND REVIEW PROCESS WAS COMPLETED BECAUSE THERE WAS A "POTENTIAL OF SIGNIFICANT RISK" TO MR. WILSON'S SAFETY FROM MR. JONES.

(ATTACHED: COMPLAINT PG 4 OF 11)

35. DEFENDANTS LINSERICH, CAPT. DUNCAN, CAPT. ROLLO, LT. DUNCAN, AND LT. NOLAN VIOLATED COOC A.R.S. #100-07, #100-01, AND #650-28 BY FAILING TO (I) SUBMIT AN INCIDENT REPORT REGARDING MR. WILSON'S SAFETY CONCERNS, (II) INITIATE THE CUSTODY ISSUE VALIDATION PROCESS, OR (III) TAKE ANY STEPS TO TEMPORARILY REMOVE MR. WILSON FROM THE BULK INMATE POPULATION.
36. DEFENDANTS LINSERICH, CAPT. DUNCAN, CAPT. ROLLO, LT. DUNCAN, AND LT. NOLAN'S FAILURE TO FOLLOW ESTABLISHED COOC POLICY TO TAKE REASONABLE MEASURES TO ENSURE MR. WILSON'S SAFETY AFTER RECEIVING THE WRITTEN REPORTS FROM MR. WILSON AND EXPOSED MR. WILSON TO THE KNOWN EXTREME RISK OF SERIOUS HARM AT THE HANDS OF ANOTHER OFFENDER - WHICH ULTIMATELY RESULTED IN MR. WILSON BEING STABBED 11 TIMES BY MR. JONES ON JULY 1ST 2023.
- E. ON OR ABOUT JULY 18TH 2023 MR. WILSON SPEAKS TO DEFENDANTS ROLLO. 2.
37. ON OR ABOUT JULY 18TH 2023, AT APPROXIMATELY 8 AM, MR. WILSON WENT TO DEFENDANT ROLLO TO SPEAK TO DEFENDANT ROLLO ABOUT WHY NO ONE HAD RESPONDED TO HIS REPORTS ABOUT MR. JONES SEXUAL MISCONDUCT, POSSESSION OF A DANGEROUS WEAPON, AND HOLDING A PAIR OF SCISSORS TO HIS NECK AND THREATENING TO KILL WILSON IF MR. JONES LEARNED MR. WILSON HAD PREVIOUSLY REPORTED MR. JONES SEXUAL MISCONDUCT.
38. AT MR. WILSON'S KNOCK AND OPENING MR. ROLLO'S OFFICE DOOR, DEFENDANT ROLLO TOLD MR. WILSON THAT HE HAD NO TIME TO SPEAK TO HIM.
39. MR. WILSON INSISTED THAT THERE WAS AN URGENT THREAT TO HIS SAFETY POSED BY MR. JONES WHO HAD HAD A PAIR OF SCISSORS TO HIS NECK AND THREATENED TO KILL HIM IF MR. JONES LEARNED HE REPORT MR. JONES SEXUAL MISCONDUCT.
40. MR. WILSON REPORTED TO DEFENDANT ROLLO THAT MR. JONES TOLD HIM THAT IT WAS CO. GOINS AND CO. AYERS WHO TOLD MR. JONES THAT MR. WILSON REPORTED MR. JONES SEXUAL MISCONDUCT, EXPOSING HIM AS A "SNITCH" WHICH CAUSED THIS INCIDENT TO HAPPEN WITH MR. JONES.
41. MR. JONES HAD BEEN REPORTED BY SEVERAL OTHER OFFENDERS TO HAVE THREATENED TO STAB THOSE OFFENDERS BECAUSE THEY DID NOT LIKE HOW MR. JONES EXPOSED AND MASTERBATED, TO ESTABLISH, IN FRONT OF MR. WILSON, THOSE INMATES, AND BULK STAFF. ALSO BULK STAFF HAD REPORT THE FACT MISCONDUCT BY MR. JONES THAT PLACED BULK STAFF IN DANGER.
42. MR. WILSON REPORTED TO DEFENDANT ROLLO THAT CO. GOINS AND CO. AYERS HAD A VERY SUSPICIOUS AND CLOSE RELATIONSHIP WHERE MR. WILSON AND OTHER INMATES WITNESSED CO. GOINS AND CO. AYERS STANDING AT MR. JONES CELL DOOR AS MR. JONES HAD HIS ERECT PENIS EXPOSED AND MASTERBATED IN FRONT OF CO. GOINS AND CO. AYERS WHO WOULD STROKE MR. JONES ERECTION WITH THEIR HANDS AND PRETEND TO DROP SOMETHING SO THEY COULD BEND OVER TO TAKE MR. JONES ERECT PENIS INTO THEIR MOUTH. THEN CO. GOINS AND CO. AYERS WOULD HAVE MR. JONES GO WITH THEM INTO THE UNIT OFFICE AND UNIT 6P BACK HALLWAY WHERE THEY COULD ENGAGE IN THE SEXUAL MISCONDUCT TOGETHER. MR. WILSON STATED THAT THEIR RELATIONSHIP WITH MR. JONES WAS INAPPROPRIATE AND ENDANGERED HIS SAFETY BECAUSE THEY EXPOSED HIM TO MR. JONES TO BE A "SNITCH" - TO HAVE REPORTED MR. JONES SEXUAL MISCONDUCT.
43. MR. WILSON ASKED DEFENDANT ROLLO IF HE HAD READ THE WRITTEN REPORT MR. WILSON SPENT TO ROLLO, OR LOCKED INTO THE REPORTS MR. WILSON MADE TO THE PREA HOTLINE AND COOC "TIPS" HOTLINE. HOWEVER DEFENDANT ROLLO STATED HE HAD NOT READ THE REPORT MR. WILSON HAD SENT HIM YET, AND DID NOT KNOW ABOUT MR. WILSON'S CALLS TO THE PREA AND COOC "TIPS" HOTLINES.
44. UNDER COOC AR #100-01 III. M. DEFENDANT ROLLO HAD THE AUTHORITY AND RESPONSIBILITY TO INITIATE THE CUSTODY ISSUE VALIDATION PROCESS, AND SUBMIT A "CUSTODY ISSUE" STATEMENT TO REPORT MR. WILSON'S SAFETY CONCERNS FROM MR. JONES, THUS ENSURING MR. WILSON AND MR. JONES WOULD NOT BE HOUSED TOGETHER FORTHWITH.

(ATTACHED: COMPLAINT PAGES 6 OF 11)

45. UNDER COOL AR #100-07 DEFENDANT ROLLO WERE REQUIRED TO SUBMIT AN INCIDENT REPORT REGARDING MR. WILSON'S CONCERNS INVOLVING MR. JONES' POSSESSION OF A DANGEROUS WEAPON AND THREATENING TO KILL MR. WILSON, AND FOR JONES HAVING SEXUAL CONTACT WITH CO. GOINS AND CO. AYERS WHO REVEALED MR. WILSON HAD REPORTED MR. JONES' SEXUAL MISCONDUCT, THAT WOULD BE PLACED IN THE PLOCIS SYSTEM, AS THEY CONSTITUTED "REPORTABLE INCIDENTS" UNDER COOL A.R. #100-07 III. R.
46. DEFENDANT ROLLO'S VIOLATIONS OF COOL AR'S #100-07, #600-01, AND #650-02, BY FAILING TO (I) SUBMIT AN INCIDENT REPORT REGARDING MR. WILSON'S SAFETY CONCERNS, (II) INITIATE THE CUSTODY ISSUE VALIDATION PROCESS, OR (III) TAKE ANY STEPS TO TEMPORARILY REMOVE FROM THE BULF INMATE POPULATION TO ENSURE MR. WILSON'S SAFETY.
47. DEFENDANT ROLLO'S FAILURE TO FOLLOW ESTABLISHED COOL POLICY AND TAKE ANY REASONABLE MEASURES TO ENSURE MR. WILSON'S SAFETY AFTER RECEIVING INFORMATION DIRECTLY FROM MR. WILSON THAT MR. JONES POSED AN IMMINENT RISK TO HIS SAFETY EXPOSED MR. WILSON TO THE KNOWN EXTREME RISK OF SERIOUS HARM AT THE HANDS OF OTHER INMATES - WHICH ULTIMATELY RESULTED IN MR. WILSON BEING STABBED 11 TIMES BY MR. JONES ON JULY 1ST, 2003.
- F. ON OR ABOUT JUNE 18TH 2003, MR. WILSON SPEAKS DEFENDANT LT. NOLAN
48. ON OR ABOUT JUNE 18TH 2003, AT APPROXIMATELY 9:00 AM, MR. WILSON WENT TO DEFENDANT NOLAN'S OFFICE TO INQUIRE ABOUT WHETHER OR NOT DEFENDANT NOLAN READ MR. WILSON REPORT CONCERNING MR. JONES' SEXUAL MISCONDUCT AND THREATS TO KILL HIM.
49. DEFENDANT NOLAN TOLD MR. WILSON HE HAD NOT READ MR. WILSON'S LETTER YET AND HE HAD NOT LOOKED INTO MR. WILSON'S PHONECALLS AND REPORTS TO THE PROB HOTLINE AND COOL'S "TAS" HOTLINE.
50. MR. WILSON DIRECTLY REPORTED TO DEFENDANT NOLAN HOW HE HAD PREVIOUSLY WITNESSED MR. JONES EXPOSING HIS ERECT PENIS AND MASTERBATING UNTIL EJACULATION INFRONT OF HIM, OTHER INMATES, AND BULF STAFF. WILSON STATED THAT HE HAD REPORTED MR. JONES' SEXUAL MISCONDUCT AND HOW CO. GOINS AND CO. AYERS WOULD PRETEND TO MR. JONES SO THEY COULD WATCH HIM, "UP CLOSE", MASTERBATE AND STROKE MR. JONES' ERECT PENIS WITH THEIR HANDS, THEN PRETEND TO DO SOMETHING SO THEY COULD PLACE JONES' ERECT PENIS IN THEIR MOUTH. DUE TO THE INAPPROPRIATE SEXUAL RELATIONSHIP BETWEEN MR. JONES, CO. GOINS AND CO. AYERS, BOTH CO. GOINS AND CO. AYERS TOLD MR. JONES THAT MR. WILSON HAD REPORTED HIS SEXUAL MISCONDUCT, WHICH RESULTED IN MR. JONES LURING MR. WILSON INTO A CELL, PLACING A PAIR OF SHARPENED SCISSORS TO MR. WILSON'S NECK AND THREATENING TO MURDER MR. WILSON.
51. DEFENDANT NOLAN KNEW OF MR. JONES' SEXUAL MISCONDUCT DUE TO THE AMOUNT OF INMATES AND BULF STAFF REPORTING MR. JONES EACH DAY. HOWEVER, DEFENDANT NOLAN SAID HE DO NOTHING ABOUT THE ISSUES WITH MR. JONES.
52. UNDER COOL AR #100-07 DEFENDANT NOLAN WAS REQUIRED TO SUBMIT AN INCIDENT REPORT IN REGARDS TO MR. WILSON'S SAFETY CONCERNS INVOLVING MR. JONES, THAT WOULD BE PLACED IN THE PLOCIS SYSTEM, AS THEY CONSTITUTED "REPORTABLE INCIDENTS" UNDER COOL AR #100-07 III. R.
53. UNDER COOL AR #600-01 III. M. DEFENDANT NOLAN HAD THE AUTHORITY AND RESPONSIBILITY TO INITIATE THE CUSTODY ISSUE VALIDATION PROCESS, AND SUBMIT A "CUSTODY ISSUE" STATEMENT TO REPORT MR. WILSON'S SAFETY CONCERNS WITH MR. JONES, THIS ENSURING MR. WILSON AND MR. JONES WOULD NOT BE HOUSED TOGETHER FORTHWITH.
54. UNDER COOL AR #600-01 III. O. AND #650-02 III. C. DEFENDANT NOLAN HAD THE AUTHORITY AND RESPONSIBILITY TO TEMPORARILY REMOVE MR. WILSON FROM THE BULF INMATE POPULATION TO ENSURE HIS SAFETY UNTIL THE INVESTIGATION AND REVIEW PROCESS WAS COMPLETED, BECAUSE THERE WAS A "POTENTIAL OF SIGNIFICANT RISK" TO MR. WILSON'S SAFETY FROM MR. JONES.
55. DEFENDANT NOLAN VIOLATED COOL AR'S #100-07, #600-01, AND #650-02, BY FAILING TO (I) SUBMIT AN INCIDENT REPORT REGARDING MR. WILSON'S SAFETY CONCERNS, (II) INITIATE THE CUSTODY ISSUE VALIDATION PROCESS, OR (III) TAKE ANY STEPS TO TEMPORARILY REMOVE MR. WILSON FROM BULF'S INMATE POPULATION TO ENSURE MR. WILSON'S SAFETY.

(ATTACHED: COMPLAINT PG 6 OF 11.)

45. UNDER COOL AR #100-07 DEFENDANT ROLLO WERE REQUIRED TO SUBMIT AN INCIDENT REPORT REGARDING MR. WILSON'S CONCERNS INVOLVING MR. JONES. POSSIBLY A DANGEROUS WEAPON AND THREATENING TO KILL MR. WILSON, AND FOR JONES HAVING SEXUAL CONTACT WITH CO. GOMIS AND CO. AYERS WHO REVEALED MR. WILSON HAD REPORTED MR. JONES SEXUAL MISCONDUCT THAT WOULD BE PLACED IN THE PDCIS SYSTEM, AS THEY CONSTITUTED "REPORTABLE INCIDENTS" UNDER COOL A.R. #100-07 III. R.
46. DEFENDANT ROLLO'S VIOLATIONS OF COOL AR'S #100-07, #600-01, AND #650-02, BY FAILING TO (I) SUBMIT AN INCIDENT REPORT REGARDING MR. WILSON'S SAFETY CONCERNS, (II) INITIATE THE CUSTODY ISSUE VALIDATION PROCESS, OR (III) TAKE ANY STEPS TO TEMPORARILY REMOVE FROM THE BULF INMATE POPULATION TO ENSURE MR. WILSON'S SAFETY.
47. DEFENDANT ROLLO'S FAILURE TO FOLLOW ESTABLISHED COOL POLICY AND TAKE ANY REASONABLE MEASURES TO ENSURE MR. WILSON'S SAFETY AFTER RECEIVING INFORMATION DIRECTLY FROM MR. WILSON THAT MR. JONES POSED AN IMMINENT RISK TO HIS SAFETY EXPOSED MR. WILSON TO THE KNOWN EXTREME RISK OF SERIOUS HARM AT THE HANDS OF OTHER INMATES - WHICH ULTIMATELY RESULTED IN MR. WILSON BEING STABBED 11 TIMES BY MR. JONES ON JULY 1ST, 2023.
- F. ON OR ABOUT JUNE 18TH 2023, MR. WILSON SPEAKS DEFENDANT LT. NOLAN
48. ON OR ABOUT JUNE 18TH 2023, AT APPROXIMATELY 9:00 AM, MR. WILSON WENT TO DEFENDANT NOLAN'S OFFICE TO INQUIRE ABOUT WHETHER OR NOT DEFENDANT NOLAN READ MR. WILSON REPORT CONCERNING MR. JONES SEXUAL MISCONDUCT AND THREATS TO KILL HIM.
49. DEFENDANT NOLAN TOLD MR. WILSON HE HAD NOT READ MR. WILSON'S LETTER YET AND HE HAD NOT LOOKED INTO MR. WILSON'S PHONECALLS AND REPORTS TO THE PREGA HOTLINE AND COOL'S "TIPS" HOTLINE.
50. MR. WILSON DIRECTLY REPORTED TO DEFENDANT NOLAN HOW HE HAD PREVIOUSLY WITNESSED MR. JONES EXPOSING HIS ERECT PENIS AND MASTERBATING UNTIL EJACULATION IN FRONT OF HIM, OTHER INMATES, AND BULF STAFF. WILSON STATED THAT HE HAD REPORTED MR. JONES SEXUAL MISCONDUCT AND HOW CO. GOMIS AND CO. AYERS WOULD PRETEND TO MR. JONES SO THEY COULD WATCH HIM, "UP CLOSE", MASTERBATE AND STROKE MR. JONES ERECT PENIS WITH THEIR HANDS, THEN PRETEND TO DROP SOMETHING SO THEY COULD PLACE JONES ERECT PENIS IN THEIR MOUTH. DUE TO THE INAPPROPRIATE SEXUAL RELATIONSHIP BETWEEN MR. JONES, CO. GOMIS AND CO. AYERS, BOTH CO. GOMIS AND CO. AYERS TOLD MR. JONES THAT MR. WILSON HAD REPORTED HIS SEXUAL MISCONDUCT, WHICH RESULTED IN MR. JONES LURING MR. WILSON INTO A CELL, PLACING A PAIR OF SHARPEAED SCISSORS TO MR. WILSON'S NECK AND THREATENING TO MURDER MR. WILSON.
51. DEFENDANT NOLAN KNEW OF MR. JONES SEXUAL MISCONDUCT DUE TO THE AMOUNT OF INMATES AND BULF STAFF REPORTING MR. JONES EACH DAY. HOWEVER, DEFENDANT NOLAN SAID HE DO NOTHING ABOUT THE ISSUES WITH MR. JONES.
52. UNDER COOL AR #100-07 DEFENDANT NOLAN WAS REQUIRED TO SUBMIT AN INCIDENT REPORT IN REGARDS TO MR. WILSON'S SAFETY CONCERNS INVOLVING MR. JONES, THAT WOULD BE PLACED IN THE PDCIS SYSTEM, AS THEY CONSTITUTED "REPORTABLE INCIDENTS" UNDER COOL AR #100-07 III. R.
53. UNDER COOL AR #600-01 II. M. DEFENDANT NOLAN HAD THE AUTHORITY AND RESPONSIBILITY TO INITIATE THE CUSTODY ISSUE VALIDATION PROCESS, AND SUBMIT A "CUSTODY ISSUE" STATEMENT TO REPORT MR. WILSON'S SAFETY CONCERNS WITH MR. JONES, THIS ENSURING MR. WILSON AND MR. JONES WOULD NOT BE HOUSED TOGETHER FORTHWITH.
54. UNDER COOL AR. #600-01 II. O. AND #650-02 II. C. DEFENDANT NOLAN HAD THE AUTHORITY AND RESPONSIBILITY TO TEMPORARILY REMOVE MR. WILSON FROM THE BULF INMATE POPULATION TO ENSURE HIS SAFETY UNTIL THE INVESTIGATION AND REVIEW PROCESS WAS COMPLETED, BECAUSE THERE WAS A "POTENTIAL OF SIGNIFICANT RISK" TO MR. WILSON'S SAFETY FROM MR. JONES.
55. DEFENDANT NOLAN VIOLATED COOL AR'S #100-07, #600-01, AND #650-02, BY FAILING TO (I) SUBMIT AN INCIDENT REPORT REGARDING MR. WILSON'S SAFETY CONCERNS, (II) INITIATE THE CUSTODY ISSUE VALIDATION PROCESS, OR (III) TAKE ANY STEPS TO TEMPORARILY REMOVE MR. WILSON FROM BULF'S INMATE POPULATION TO ENSURE MR. WILSON'S SAFETY.

(ATTACHED: COMPLAINT PG 6 OF 11.)

56. DEFENDANT NOLANS FAILURE TO FOLLOW COOC POLICY AND TAKE REASONABLE MEASURES TO ENSURE MR. WILSON'S SAFETY AFTER MR. WILSON'S DIRECT REPORT EXPOSED MR. WILSON TO THE KNOWN EXTREME RISK OF SERIOUS HARM AT THE HANDS OF ANOTHER INMATE - WHICH ULTIMATELY RESULTED IN MR. WILSON BEING STABBED 11 TIMES BY MR. JONES ON JULY 1ST, 2023.

H. MR. WILSON SPEAKS TO DEFENDANT GOINS ON OR ABOUT JUNE 19TH, 2023

57. ON OR ABOUT JUNE 19TH, 2023, AT APPROXIMATELY 11M, WILSON TELLS DEFENDANT GOINS THAT MR. JONES LURED HIM INTO A CELL, THEN PLACED A SHARPENED PAIR OF SCISSORS TO HIS NECK AND SAID HE WAS TOLD BY GOINS AND AYERS THAT MR. WILSON REPORTED MR. JONES FOR EXPOSING AND MASTERBATING, UNTIL ETRACULATION, SEVERAL TIMES PER DAY IN FRONT OF MR. WILSON, OTHER INMATES, AND BULF STAFF, INCLUDING DEFENDANTS GOINS AND AYERS (BOTH FEMALES). MR. WILSON TOLD DEFENDANT GOINS THAT MR. JONES THREATENED TO KILL MR. WILSON IF HE LEARNED MR. WILSON HAD SWITCHED - REPORTED MR. JONES. MR. WILSON ASKED WHY DEFENDANT GOINS DID THIS.
58. DEFENDANT GOINS ADMITTED TO MR. WILSON THAT BOTH SHE AND DEFENDANT AYERS TOLD MR. JONES THAT MR. WILSON HAD REPORTED MR. JONES BECAUSE: "IT IS NOT COOL TO SWITCH"; AND IT WAS BETTER IF MR. WILSON WOULD PUNCH MR. JONES IF HE DID NOT LIKE SEEING MR. JONES' ERECT PENIS THAT HE MASTERBATED ALL DAY.
59. DEFENDANT GOINS STATED TO MR. WILSON THAT "REAL MEN DO NOT SWITCH ON PEOPLE" AND THAT MR. JONES IS NOT SWITCHING ON MR. WILSON, SO MR. WILSON WAS BEING A "BITCH" FOR REPORTING MR. JONES.
60. MR. WILSON ASKED DEFENDANT GOINS HOW SHE COULD DEFEND MR. JONES EXPOSING AND MASTERBATING IN FRONT OF EVERYONE, INCLUDING DEFENDANT GOINS, ALL DAY LIKE A SEXUAL PREDATOR. DEFENDANT GOINS STATED SHE "HATES SWITCHES" AND WOULD "NEVER SWITCH ON ANYONE, BECAUSE THAT IS WHAT COONARDS DO!"
61. UNDER COOC AR. #100-07 DEFENDANT GOINS WAS REQUIRED TO SUBMIT AN INCIDENT REPORT CONCERNING MR. WILSON'S SAFETY CONCERNS INVOLVING MR. JONES, THAT WOULD BE PLACED IN THE PLCIS SYSTEM, AS THEY CONSTITUTED "REPORTABLE INCIDENTS" UNDER COOC A.R. #100-07 III. R.
62. UNDER COOC A.R. #600-01 III. O. AND #650-02 III. c. DEFENDANT GOINS HAD THE AUTHORITY AND RESPONSIBILITY TO TEMPORARILY REMOVE MR. WILSON FROM BULF INMATE POPULATION TO ENSURE HIS SAFETY UNTIL THE INVESTIGATION AND REVIEW PROCESS WAS COMPLETED, BECAUSE THERE WAS A "POTENTIAL OF SIGNIFICANT RISK" TO MR. WILSON'S SAFETY FROM MR. JONES.
63. UNDER COOC AR. #600-01 III. m. DEFENDANT GOINGS HAD THE AUTHORITY AND RESPONSIBILITY TO INITIATE THE CUSTODY ISSUE VALIDATION PROCESS, AND SUBMIT A "CUSTODY ISSUE" STATEMENT TO REPORT MR. WILSON'S SAFETY ISSUES WITH MR. JONES, THUS ENSURING MR. WILSON AND MR. JONES WOULD NOT BE HOUSED TOGETHER FORTHWITH.
64. DEFENDANT GOINS VIOLATED COOC ARS #100-07, #600-01, AND #650-02, BY FAILING TO (I) SUBMIT AN INCIDENT REPORT REGARDING MR. WILSON'S SAFETY CONCERNS, (II) INITIATE THE CUSTODY ISSUE VALIDATION PROCESS, OR (III) TAKE ANY STEPS TO TEMPORARILY REMOVE MR. WILSON FROM BULF INMATE POPULATION TO ENSURE HIS SAFETY.
65. DEFENDANT GOINS FAILURE TO FOLLOW COOC POLICY AND TAKE REASONABLE MEASURES TO ENSURE MR. WILSON'S SAFETY AFTER MR. WILSON'S DIRECT REPORT EXPOSED MR. WILSON TO THE KNOWN EXTREME RISK OF SERIOUS HARM AT THE HANDS OF ANOTHER INMATE - WHICH ULTIMATELY RESULTED IN MR. WILSON BEING STABBED 11 TIMES BY MR. JONES ON JULY 1ST, 2023.

I. MR. WILSON SPEAKS TO DEFENDANT AYERS ON OR ABOUT JUNE 19TH, 2023

66. ON OR ABOUT JUNE 19TH, 2023 AT APPROXIMATELY 4:30 PM MR. WILSON TELLS DEFENDANT AYERS THAT MR. JONES LURED HIM INTO A CELL AND PLACED A PAIR OF SHARPENED SCISSORS TO HIS NECK BECAUSE DEFENDANTS GOINS AND AYERS TOLD MR. JONES THAT MR. WILSON WAS EXPOSING AND MASTERBATING HIS ERECT PENIS UNTIL ETRACULATION IN FRONT OF MR. WILSON, OTHER INMATES AND BULF STAFF INCLUDING DEFENDANT AYERS HERSELF. MR. WILSON REPORTED TO DEFENDANT AYERS THAT DEFENDANT GOINS, EARLIER IN THE DAY, ADMITTED TO MR. WILSON THAT SHE AND AYERS TOLD MR. JONES THAT MR. WILSON

(ATTACHED: COMPLAINT Pg. 7 OF 11)

HAD "SWITCHED" ("REPORTED") MR. JONES' SEXUAL MISCONDUCT.

- 69. MR. WILSON INFORMED DEFENDANT AYERS THAT MR. JONES THREATENED TO KILL HIM FOR REPORTING HIS SEXUAL MISCONDUCT AND THAT MR. WILSON WAS FORCED TO CALL THE PREA AND COOC "TIPS" HOTLINE IN THE HOPE THAT SOMEONE OUTSIDE BULF WOULD PROTECT HIM FROM MR. JONES BECAUSE HE WOULD SOON LEARN THAT MR. WILSON REPORTED HIM TO PREA AND THE COOC "TIPS" HOTLINE.
- 68. DEFENDANT AYERS CLAIMED SHE DID NOT TELL MR. JONES THAT MR. WILSON REPORTED HIS SEXUAL MISCONDUCT AND DID NOT KNOW WHY DEFENDANT GONS CLAIMED THAT THEY DID. DEFENDANT AYERS TOLD MR. WILSON THAT EVERYDAY SHE WORKS MR. JONES EXPOSES HIS ERECT PENIS, MASTERBATES AND EJACULATES IN HER PRESENCE. DEFENDANT AYERS STATED WHEN SHE AND OTHER BULF STAFF BROUGHT UP MR. JONES' SEXUAL MISCONDUCT TO DEFENDANTS CAPT. DUKAKI, LT. DUKAKI, LT. NOLAN, AND CAPT. ROLLO NONE OF THEM SEEMED TO CARE. THEREFORE IT WAS POINTLESS TO SAY ANYTHING AND TO REPORT WHAT MR. JONES DID EVERYDAY.
- 69. DEFENDANT AYERS TOLD MR. WILSON THAT SHE HAD NOT HEARD ABOUT HIM REPORTING MR. JONES TO THE PREA AND COOC "TIPS" HOTLINE AND DOUBTED ANYTHING WOULD HAPPEN TO MR. JONES SINCE MR. JONES WAS NEVER REALLY PUNISHED. AYERS STATED THAT SHE LEARNED THAT BY NOT "COUSING WIVES" (NOT REPORTING MR. JONES), KEEPING HER MOUTH SHUT AND GOING WITH THE FLOW EVERYDAY, SHE FOUND THAT SHE ENJOYS COMING TO WORK AND SHE BEGAN LETTING THINGS GO AND SUGGESTED HE DO THE SAME.
- 70. UNDER COOC A.R. #100-07 DEFENDANT AYERS WAS REQUIRED TO SUBMIT AN INCIDENT REPORT CONCERNING MR. WILSON'S SAFETY ISSUES WITH MR. JONES, THAT WOULD BE PLACED IN THE PDCIS SYSTEM, AS THEY CONSTITUTED "REPORTABLE INCIDENTS" UNDER COOC A.R. #100-07 III. R.
- 71. UNDER COOC A.R. #600-01 III. M. DEFENDANT AYERS HAD THE AUTHORITY AND RESPONSIBILITY TO INITIATE THE CUSTODY ISSUE VALIDATION PROCESS, AND SUBMIT A "CUSTODY ISSUE" STATEMENT TO REPORT MR. WILSON'S SAFETY ISSUES WITH MR. JONES, THUS ENSURING MR. WILSON AND MR. JONES WOULD NOT BE HOUSED TOGETHER FORTHWITH.
- 72. UNDER COOC A.R.'S #600-01 III. O. AND #650-02 III. C. DEFENDANT AYERS HAD THE AUTHORITY AND RESPONSIBILITY TO TEMPORARILY REMOVE MR. WILSON FROM BULF INMATE POPULATION TO ENSURE HIS SAFETY UNTIL THE INVESTIGATION AND REVIEW PROCESS WAS COMPLETE, BECAUSE THERE WAS A "POTENTIAL OF SIGNIFICANT RISK" TO MR. WILSON'S SAFETY FROM MR. JONES.
- 73. DEFENDANT AYERS VIOLATED COOC A.R.'S #100-07, #600-02 I AND #650-02, BY FAILING TO (I) SUBMIT AN INCIDENT REPORT REGARDING MR. WILSON'S SAFETY CONCERNS; (II) INITIATE THE CUSTODY ISSUE VALIDATION PROCESS; OR (III) TAKE ANY STEPS TO TEMPORARILY REMOVE MR. WILSON FROM THE BULF INMATE POPULATION TO ENSURE HIS SAFETY.
- 74. DEFENDANT AYERS FAILURE TO FOLLOW COOC POLICY AND TAKE REASONABLE MEASURES TO ENSURE MR. WILSON'S SAFETY AFTER HIS DIRECT REPORT AND EXPOSED MR. WILSON TO THE KNOWN EXTREME RISK OF SERIOUS HARM AT THE HANDS OF ANOTHER INMATE - WHICH ULTIMATELY RESULTED IN MR. WILSON BEING STRABBED 11 TIMES BY MR. JONES ON JULY 1ST 2003.
- J. MR. WILSON ATTEMPTS TO SPEAK TO MENTAL HEALTH DEFENDANT DR. LISA SOULE
- 75. BETWEEN JUNE 19TH AND JUNE 23RD 2003, MR. JONES CONTINUED TO BE HOSTILE TOWARDS MR. WILSON AND NO BULF STAFF HAD COME TO SPEAK TO HIM CONCERNING HIS REPORTS TO THE PREA HOTLINE AND THE COOC "TIPS" HOTLINE WHERE HE REPORTED MR. JONES RAILY (SEXUAL MISCONDUCT), POSSESSION OF A DANGEROUS WEAPON AND MR. JONES THREAT TO KILL HIM IF MR. JONES LEARNED HE SWITCHED ("REPORTED") MR. JONES.
- 76. DURING THIS TIME MR. WILSON ATTEMPTED TO REQUEST, IN WRITING, AND VERBALLY THE ACCESS TO MENTAL HEALTH DUE TO HIS GROWING MENTAL HEALTH CRISIS HE EXPERIENCED BY BEING HOUSED WITH MR. JONES, WHO ENDANGERED HIS SAFETY AND CONTINUED TO EXPOSE AND MASTERBATE UNTIL EJACULATION IN THE PRESENCE OF MR. WILSON, OTHER INMATES, AND BULF STAFF.
- 77. HOWEVER, MR. WILSON'S REQUEST FOR MENTAL HEALTH ACCESS WAS DENIED BY DEFENDANT DR. LISA SOULE.

(ATTACHED: COMPLAINT PGS OF 11)

HAD "SWITCHED" ("REPORTED") MR. JONES' SEXUAL MISCONDUCT.

67. MR. WILSON INFORMED DEFENDANT AYERS THAT MR. JONES THREATENED TO KILL HIM FOR REPORTING HIS ~~SEXUAL MISCONDUCT~~ AND THAT MR. WILSON WAS FORCED TO CALL THE PREA AND COOL "TIPS" HOTLINE IN THE HOPE THAT SOMEONE OUTSIDE BULF WOULD PROTECT HIM FROM MR. JONES BECAUSE HE WOULD SOON LEARN THAT MR. WILSON REPORTED HIM TO PREA AND THE COOL "TIPS" HOTLINE.
68. DEFENDANT AYERS CLAIMED SHE DID NOT TELL MR. JONES THAT MR. WILSON REPORTED HIS SEXUAL MISCONDUCT AND DID NOT KNOW WHY DEFENDANT GOINS CLAIMED THAT THEY DID. DEFENDANT AYERS TOLD MR. WILSON THAT EVERYDAY SHE WORKS MR. JONES EXPOSES HIS ERECT PENIS, MASTURBATES AND EJACULATES IN HER PRESENCE. DEFENDANT AYERS STATED WHEN SHE AND OTHER BULF STAFF BROUGHT UP MR. JONES' SEXUAL MISCONDUCT TO DEFENDANTS CAPT. DUNKAN, LT. DUNKAN, LT. NOLAN AND CAPT. DOLLO NONE OF THEM SEEMED TO CARE. THEREFORE IT WAS POINTLESS TO SAY ANYTHING AND TO REPORT WHAT MR. JONES DID EVERYDAY.
69. DEFENDANT AYERS TOLD MR. WILSON THAT SHE HAD NOT HEARD ABOUT HIM REPORTING MR. JONES TO THE PREA AND COOL "TIPS" HOTLINE AND DOUBTED ANYTHING WOULD HAPPEN TO MR. JONES SINCE MR. JONES WAS NEVER REALLY PUNISHED. AYERS STATED THAT SHE LEARNED THAT BY NOT "COVERING UP" ("NOT REPORTING MR. JONES"), KEEPING HER MOUTH SHUT AND GOING WITH THE FLOW EVERYDAY, SHE FOUND THAT SHE ENJOYS COMING TO WORK AND SHE BEGAN LETTING THINGS GO AND SUGGESTED HE DO THE SAME.
70. UNDER ODOC A.R.S. §100-07 DEFENDANT AYERS WAS REQUIRED TO SUBMIT AN INCIDENT REPORT CONCERNING MR. WILSON'S SAFETY ISSUES WITH MR. JONES, THAT WOULD BE PLACED IN THE PDCIS SYSTEM, AS THEY CONSTITUTED "REPORTABLE INCIDENTS" UNDER COOL A.R.S. §100-07 III. R.
71. UNDER COOL A.R. §100-01 II. m. DEFENDANT AYERS HAD THE AUTHORITY AND RESPONSIBILITY TO INITIATE THE CUSTODY ISSUE VALIDATION PROCESS, AND SUBMIT A "CUSTODY ISSUE" STATEMENT TO RESPECT MR. WILSON'S SAFETY ISSUES WITH MR. JONES, THUS ENSURING MR. WILSON AND MR. JONES WOULD NOT BE HOUSED TOGETHER FORTHWITH.
72. UNDER COOL A.R.S. §100-01 II. o. AND §100-02 II. c. DEFENDANT AYERS HAD THE AUTHORITY AND RESPONSIBILITY TO TEMPORARILY REMOVE MR. WILSON FROM BULF INMATE POPULATION TO ENSURE HIS SAFETY UNTIL THE INVESTIGATION AND REVIEW PROCESS WAS COMPLETE, BECAUSE THERE WAS A "POTENTIAL OF SIGNIFICANT RISK" TO MR. WILSON'S SAFETY FROM MR. JONES.
73. DEFENDANT AYERS VIOLATED COOL A.R.S. §100-07, §100-02, AND §100-02. BY FAILING TO (I) SUBMIT AN INCIDENT REPORT REGARDING MR. WILSON'S SAFETY CONCERNS; (II) INITIATE THE CUSTODY ISSUE VALIDATION PROCESS; OR (III) TAKE ANY STEPS TO TEMPORARILY REMOVE MR. WILSON FROM THE BULF INMATE POPULATION TO ENSURE HIS SAFETY.
74. DEFENDANT AYERS FAILURE TO FOLLOW COOL POLICY AND TAKE REASONABLE MEASURES TO ENSURE MR. WILSON'S SAFETY AFTER HIS DIRECT REPORT AND EXPOSED MR. WILSON TO THE KNOWN EXTREME RISK OF SERIOUS HARM AT THE HANDS OF ANOTHER INMATE - WHICH ULTIMATELY RESULTED IN MR. WILSON BEING STRABBED 11 TIMES BY MR. JONES ON JULY 1ST 2023.
- J. MR. WILSON ATTEMPTS TO SPEAK TO MENTAL HEALTH DEFENDANT DR. LISA SOULE
75. BETWEEN JUNE 19TH AND JUNE 23RD 2023, MR. JONES CONTINUED TO BE HOSTILE TOWARDS MR. WILSON AND NO BULF STAFF HAD COME TO SPEAK TO HIM CONCERNING HIS REPORTS TO THE PREA HOTLINE AND THE COOL "TIPS" HOTLINE WHERE HE REPORTED MR. JONES RAILY SEXUAL MISCONDUCT, POSSESSION OF A DANGEROUS WEAPON AND MR. JONES THREAT TO KILL HIM IF MR. JONES LEARNED HE SWITCHED ("REPORTED") MR. JONES.
76. DURING THIS TIME MR. WILSON ATTEMPTED TO REQUEST, IN WRITING, AND VERBALLY THE ACCESS TO MENTAL HEALTH DUE TO HIS GROWING MENTAL HEALTH CRISIS HE EXPERIENCED BY BEING HOUSED WITH MR. JONES, WHO ENDANGERED HIS SAFETY AND CONTINUED TO EXPOSE AND MASTURBATE UNTIL EJACULATION IN THE PRESENCE OF MR. WILSON, OTHER INMATES, AND BULF STAFF.
77. HOWEVER, MR. WILSON'S REQUEST FOR MENTAL HEALTH ACCESS WAS DENIED BY DEFENDANT DR. LISA SOULE.

(ATTACHED: COMPLAINT PAGES 8 OF 11)

- EVEN AFTER MR. WILSON DECLARED TO BULF STAFF THAT HE WAS HAVING A MENTAL HEALTH EMERGENCY, WHICH USUALLY RESULT IN ACCESS TO MENTAL HEALTH SERVICES PROFESSIONALS.
78. ON OR ABOUT JUNE 24TH 2023, MR. WILSON SAW DEFENDANT DR. SOULE ENTER BULF 6P AND REQUESTED TO SPEAK TO HER, BECAUSE MR. JONES HAD THREATENED TO MURDER MR. WILSON AS HE HELD SHARPENED SCISSORS TO MR. WILSON'S NECK AFTER MR. JONES SAID DEFENDANTS GOING AND AVERS TOLD HIM MR. WILSON HAD REPORTED MR. JONES FOR EXPOSING AND MASTERBATING UNTIL EJACULATION SEVERAL TIMES PER DAY IN VIEW OF MR. WILSON, OTHER INMATES, AND BULF STAFF.
79. DEFENDANT DR. SOULE TOLD MR. WILSON THAT OTHER BULF INMATES HAVE MORE PRESSING ISSUES THAN MR. WILSON, WHO ONLY SEEMS PANICKED ABOUT SEEING MR. JONES' ERECTION AND HIM MASTERBATING, WHEN THIS WAS NOT A SERIOUS INCIDENT, AND SOMETHING MR. WILSON SHOULD BE ACCUSTOMED TO DUE TO HOW COMMON SUCH MASTERBATION OCCURS IN ALL PRISONS EVERYDAY.
80. AS MR. WILSON ATTEMPTED TO EXPLAIN THAT IT WASN'T ONLY THE SEXUAL MISCONDUCT FROM MR. JONES, BUT THAT HE HAD THREATENED TO KILL MR. WILSON, DEFENDANT DR. SOULE SAID SHE DID NOT HAVE TIME FOR HIS NON-SENSE, AND MR. WILSON WAS OVERREACTING TO MR. JONES EXPOSING AND MASTERBATING HIS ERECT PENIS.
81. MR. WILSON ATTEMPTED TO EXPLAIN THAT SHE WAS NOT UNDERSTANDING HIM, AND DEFENDANT DR. SOULE INTERRUPTED MR. WILSON BY STATING, "YOU DON'T THINK I UNDERSTAND ABOUT SEEING INMATES 'JACKING OFF'?! I SEE IT ALL THE TIME AND IT'S NOT SUCH AN INCIDENT THAT WOULD WARRANT A MENTAL HEALTH EMERGENCY."
82. DEFENDANT DR. SOULE STATED THAT MR. WILSON SHOULD PROBABLY MIND HIS OWN BUSINESS SO THAT THIS INCIDENT WITH MR. JONES, THEN LEFT THE UNIT, IGNORING MR. WILSON.
83. UNDER COOL A.R.S. #100-07 DEFENDANT DR. SOULE WAS REQUIRED TO SUBMIT AN INCIDENT REPORT CONCERNING MR. WILSON'S SAFETY ISSUES WITH MR. JONES, THAT WOULD BE PLACED IN THE PCDCS SYSTEM, AS THEY CONSTITUTED "REPORTABLE INCIDENTS" UNDER COOL AC #100-07 III. R.
84. UNDER COOL A.R. #600-D1 II. M. DEFENDANT DR. SOULE HAD THE AUTHORITY AND RESPONSIBILITY TO INITIATE THE CUSTODY ISSUE VALIDATION PROCESS, AND SUBMIT A "CUSTODY ISSUE" STATEMENT TO REPORT MR. WILSON'S SAFETY ISSUES WITH MR. JONES, THUS ENSURING MR. WILSON AND MR. JONES WOULD NOT BE HOUSED TOGETHER FORTHWITH.
85. UNDER COOL A.R.S. #600-01 III. D. AND #650-02 III. C. DEFENDANT DR. SOULE HAD THE AUTHORITY AND RESPONSIBILITY TO TEMPORARILY REMOVE MR. WILSON FROM BULF INMATE POPULATION TO ENSURE HIS SAFETY UNTIL THE INVESTIGATION AND REVIEW PROCESS WAS COMPLETE, BECAUSE THERE WAS A "POTENTIAL OF SIGNIFICANT RISK" TO MR. WILSON'S SAFETY FROM MR. JONES.
86. DEFENDANT DR. SOULE VIOLATED COOL POLICY #100-07, #600-01 AND #650-02, BY FAILING TO (I) SUBMIT AN INCIDENT REPORT REGARDING MR. WILSON'S SAFETY CONCERNS, (II) INITIATE THE CUSTODY ISSUE VALIDATION PROCESS, OR (III) TAKE ANY STEPS TO TEMPORARILY REMOVE MR. WILSON FROM BULF INMATE POPULATION TO ENSURE HIS SAFETY.
87. DEFENDANT DR. SOULE'S FAILURE TO FOLLOW COOL POLICY AND TAKE REASONABLE MEASURES TO ENSURE MR. WILSON'S SAFETY AFTER HIS DIRECT REPORT AND EXPOSED MR. WILSON TO THE KNOWN EXTREME RISK OF SERIOUS HARM AT THE HANDS OF ANOTHER INMATE- WHICH ULTIMATELY RESULTED IN MR. WILSON BEING STABBED 11 TIMES BY MR. JONES ON JULY 1ST 2023.
- K. DEFENDANT TUCKER SEARCHED MR. JONES' CELL AND TELLS MR. JONES OF MR. WILSON'S REPORTS
88. ON OR ABOUT JUNE 27TH 2023, DEFENDANT TUCKER SEARCHED THE CELL OF MR. JONES IN RESPONSE TO MR. WILSON'S REPORTED REPORTS THAT MR. JONES HAD HELD A PAIR OF SHARPENED SCISSORS TO HIS NECK AND THREATENED TO KILL MR. WILSON IF HE LEARNED MR. WILSON PREVIOUSLY REPORTED MR. JONES' SEXUAL MISCONDUCT.
89. DURING THE CELL SEARCH MR. JONES ASKED DEFENDANT TUCKER WHY HIS CELL WAS BEING SEARCHED, AND DEFENDANT TUCKER TOLD MR. JONES THAT HIS CELL WAS BEING SEARCHED BECAUSE MR. WILSON HAD REPORTED THAT MR. JONES HAD A DANGEROUS WEAPON.
90. DEFENDANT TUCKER SAW THE SHARPENED METAL SCISSORS IN MR. JONES CELL THAT MR. WILSON HAD REPORTED MR. JONES HELD TO HIS THROAT. HOWEVER, MR. JONES CONTINUED TO POSSESS THE SHARPENED

[ ATTACHED: COMPLAINT PG. 9 OF 11 ]

METAL SCISSORS DUE TO DEFENDANT TUCKER'S FAILURE TO CONFISCATE THE DANGEROUS WEAPON MR. WILSON SPECIFICALLY REPORTED MR. JONES HAD THREATENED HIM WITH.

91. DEFENDANT TUCKER'S FAILURE TO CONFISCATE THE SCISSORS RESULTED ULTIMATELY, IN MR. WILSON BEING STABBED 11 TIMES BY MR. JONES, WITH THREE STAB SCISSORS ON JULY 1ST 2003.
92. UNDER COOL AR #100-07 DEFENDANT TUCKER WAS REQUIRED TO SUBMIT AN INCIDENT REPORT CONCERNING MR. WILSON'S SAFETY ISSUES WITH MR. JONES, THAT WOULD BE PLACED IN THE PCDUS SYSTEM, AS THEY LAUSSTRATED "REPORTABLE INCIDENTS" UNDER COOL AR #100-07 III. R.
93. UNDER COOL AR #600-01 III. M. DEFENDANT TUCKER HAD THE AUTHORITY AND RESPONSIBILITY TO INITIATE THE CUSTODY ISSUE VALIDATION PROCESS, AND SUBMIT A "CUSTODY ISSUE" STATEMENT TO REPORT MR. WILSON'S SAFETY ISSUES WITH MR. JONES, THUS ENSURING MR. WILSON AND MR. JONES WOULD NOT BE HOUSE TOGETHER FORTHWITH.
94. UNDER COOL ARS #600-01 III. O. AND #650-02 III. C. DEFENDANT TUCKER HAD THE AUTHORITY AND THE RESPONSIBILITY TO TEMPORARILY REMOVE MR. WILSON FROM BUCF INMATE POPULATION TO ENSURE HIS SAFETY UNTIL THE INVESTIGATION AND REVIEW PROCESS WAS COMPLETED, BECAUSE THERE WAS A "POTENTIAL OF SIGNIFICANT RISK" TO MR. WILSON'S SAFETY FROM MR. JONES.
95. DEFENDANT TUCKER VIOLATE COOL ARS #100-07, #600-01, AND #650-02, BY FAILING TO (I) SUBMIT AN INCIDENT REPORT REGARDING MR. WILSON'S SAFETY CONCERNS, (II) INITIATE THE CUSTODY ISSUE VALIDATION PROCESS, OR (III) TAKE ANY STEPS TO TEMPORARILY REMOVE MR. WILSON FROM BUCF INMATE POPULATION TO ENSURE HIS SAFETY.
96. DEFENDANT TUCKER'S FAILURE TO FOLLOW COOL POLICY, CONFISCATE THE SHARPENED SCISSORS, AND TAKE REASONABLE MEASURES TO ENSURE MR. WILSON'S SAFETY AFTER HIS DIRECT REPORTS EXPOSED MR. WILSON TO THE KNOWN EXTREME RISK OF SERIOUS HARM AT THE HANDS OF ANOTHER INMATE - WHICH ULTIMATELY RESULTED IN MR. WILSON BEING STABBED 11 TIMES BY MR. JONES ON JULY 1ST 2003.
- L. MR. WILSON REPORTS MR. JONES THREATS TO DEFENDANT SUGGS
97. ON OR ABOUT JUNE 30TH 2003, MR. WILSON SPoke TO DEFENDANT SUGGS AT THE BUCF UNIT 4P OFFICE CONCERNING THE TREMENDOUS THREAT MR. JONES PRESENTED TO HIS SAFETY.
98. MR. WILSON TOLD DEFENDANT SUGGS THAT MR. JONES HAD PREVIOUSLY IURD HIM INTO A CELL, PRESSED A PAIR OF SHARPENED SCISSORS TO MR. WILSON'S THROAT AND THREATENED TO KILL MR. WILSON IF HE LEARNED MR. WILSON REPORTED MR. JONES' SEXUAL MISCONDUCT.
99. MR. WILSON TOLD DEFENDANT SUGGS THAT HE HAD CALLED THE PREA AND COOL CRIME TIPS HOTLINE TO REPORT MR. JONES' SEXUAL MISCONDUCT AND THREATENING TO KILL HIM, BUT NO ONE HAD SPoke TO MR. WILSON REGARDING HIS REPORTS TO THE PREA AND COOL TIPS' HOTLINE.
100. DEFENDANT SUGGS CLAIMED THERE WAS NOTHING HE COULD DO TO HELP MR. WILSON AND CLAIMED HE HAD NO KNOWLEDGE OF MR. WILSON'S REPORTS TO THE PREA AND COOL TIPS' HOTLINE.
101. UNDER COOL AR #100-07 DEFENDANT SUGGS WAS REQUIRED TO SUBMIT AN INCIDENT REPORT CONCERNING MR. WILSON'S SAFETY ISSUES WITH MR. JONES, THAT WOULD BE PLACED IN THE PCDUS SYSTEM, AS THEY UNSTRATED "REPORTABLE INCIDENTS" UNDER COOL AR #100-07 III. R.
102. UNDER COOL AR #600-01 III. M. DEFENDANT SUGGS HAD THE AUTHORITY AND RESPONSIBILITY TO INITIATE THE CUSTODY ISSUE VALIDATION PROCESS, AND SUBMIT A "CUSTODY ISSUE" STATEMENT TO REPORT MR. WILSON'S SAFETY ISSUES WITH MR. JONES, THUS ENSURING MR. WILSON AND MR. JONES WOULD NOT BE HOUSE TOGETHER FORTHWITH.
103. UNDER COOL ARS #600-01 III. O. AND #650-02 III. C. DEFENDANT SUGGS HAD THE AUTHORITY AND THE RESPONSIBILITY TO TEMPORARILY REMOVE MR. WILSON FROM BUCF INMATE POPULATION TO ENSURE HIS SAFETY UNTIL THE INVESTIGATION AND REVIEW PROCESS WAS COMPLETED, BECAUSE THERE WAS A "POTENTIAL OF SIGNIFICANT RISK" TO MR. WILSON'S SAFETY FROM MR. JONES.
104. DEFENDANT SUGGS VIOLATED COOL ARS #100-07, #600-01, AND #650-02, BY FAILING TO (I) SUBMIT AN INCIDENT REPORT REGARDING MR. WILSON'S SAFETY CONCERNS, (II) INITIATE THE CUSTODY ISSUE VALIDATION PROCESS, OR (III) TAKE ANY STEPS TO TEMPORARILY REMOVE MR. WILSON FROM BUCF INMATE POPULATION TO ENSURE HIS SAFETY.
105. DEFENDANT SUGGS FAILURE TO FOLLOW COOL POLICY, AND TAKE REASONABLE MEASURES TO ENSURE MR. WILSON'S SAFETY AFTER HIS DIRECT REPORTS EXPOSED MR. WILSON TO THE KNOWN EXTREME RISK OF SERIOUS HARM AT THE HANDS OF ANOTHER INMATE - WHICH ULTIMATELY RESULTED IN MR. WILSON BEING STABBED 11 TIMES BY MR. JONES ON JULY, 1ST 2003.

(ATTACHED: COMPLAINT PG. 10 OF 11 )

- METAL SCISSORS DUE TO DEFENDANT TUCKER'S FAILURE TO CONFISCATE THE DANGEROUS WEAPON MR. WILSON SPECIFICALLY REPORTED MR. JONES HAD THREATENED HIM WITH.
91. DEFENDANT TUCKER'S FAILURE TO CONFISCATE THE SCISSORS RESULTED ULTIMATELY, IN MR. WILSON BEING STABBED 11 TIMES BY MR. JONES, WITH THESE STAFF SCISSORS ON JULY 1ST 2023.
  92. UNDER COOL AR #100-07 DEFENDANT TUCKER WAS REQUIRED TO SUBMIT AN INCIDENT REPORT CONCERNING MR. WILSON'S SAFETY ISSUES WITH MR. JONES, THAT WOULD BE PLACED IN THE P.C.O.C.S SYSTEM, AS THEY LANSTATED "REPORTABLE INCIDENTS" UNDER COOL AR #100-07 III. R.
  93. UNDER COOL AR #600-01 III. M. DEFENDANT TUCKER HAD THE AUTHORITY AND RESPONSIBILITY TO INITIATE THE CUSTODY ISSUE VALIDATION PROCESS, AND SUBMIT A "CUSTODY ISSUE" STATEMENT TO REPORT MR. WILSON'S SAFETY ISSUES WITH MR. JONES, THUS ENSURING MR. WILSON AND MR. JONES WOULD NOT BE HOUSD TOGETHER FORTHWITH.
  94. UNDER COOL ARS #600-01 III. O. AND #650-02 III. C. DEFENDANT TUCKER HAD THE AUTHORITY AND THE RESPONSIBILITY TO TEMPORARILY REMOVE MR. WILSON FROM BUCF INMATE POPULATION TO ENSURE HIS SAFETY UNTIL THE INVESTIGATION AND REVIEW PROCESS WAS COMPLETED, BECAUSE THERE WAS A "POTENTIAL OF SIGNIFICANT RISK" TO MR. WILSON'S SAFETY FROM MR. JONES.
  95. DEFENDANT TUCKER VIOLATE COOL ARS #100-07, #600-01, AND #650-02, BY FAILING TO (I) SUBMIT AN INCIDENT REPORT REGARDING MR. WILSON'S SAFETY CONCERNS, (II) INITIATE THE CUSTODY ISSUE VALIDATION PROCESS, OR (III) TAKE ANY STEPS TO TEMPORARILY REMOVE MR. WILSON FROM BUCF INMATE POPULATION TO ENSURE HIS SAFETY.
  96. DEFENDANT TUCKER'S FAILURE TO FOLLOW COOL POLICY, CONFISCATE THE SHARPENED SCISSORS, AND TAKE REASONABLE MEASURES TO ENSURE MR. WILSON'S SAFETY AFTER HIS DIRECT REPORTS EXPOSED MR. WILSON TO THE KNOWN EXTREME RISK OF SERIOUS HARM AT THE HANDS OF ANOTHER INMATE - WHICH ULTIMATELY RESULTED IN MR. WILSON BEING STABBED 11 TIMES BY MR. JONES ON JULY 1ST 2023
  - L. MR. WILSON REPORTS MR. JONES THREATS TO DEFENDANT SUGGS
  97. ON OR ABOUT JUNE 30TH 2023, MR. WILSON SPOKE TO DEFENDANT SUGGS AT THE BUCF UNIT 60 OFFICE CONCERNING THE TRENENDOUS THREAT MR. JONES PRESENTED TO HIS SAFETY.
  98. MR. WILSON TOLD DEFENDANT SUGGS THAT MR. JONES HAD PREVIOUSLY LURED HIM INTO A CELL, PRESSED A PAIR OF SHARPENED SCISSORS TO MR. WILSON'S THROAT AND THREATENED TO KILL MR. WILSON IF HE LEARNED MR. WILSON REPORTED MR. JONES' SEXUAL MISCONDUCT.
  99. MR. WILSON TOLD DEFENDANT SUGGS THAT HE HAD CALLED THE PREA AND COOL CRIME TIPS HOTLINE TO REPORT MR. JONES' SEXUAL MISCONDUCT AND THREATENING TO KILL HIM, BUT NO ONE HAD SPOKE TO MR. WILSON REGARDING HIS REPORTS TO THE PREA AND COOL TIPS' HOTLINE.
  100. DEFENDANT SUGGS CLAIMED THERE WAS NOTHING HE COULD DO TO HELP MR. WILSON AND CLAIMED HE HAD NO KNOWLEDGE OF MR. WILSON'S REPORTS TO THE PREA AND COOL "TIPS" HOTLINE.
  101. UNDER COOL AR #100-07 DEFENDANT SUGGS WAS REQUIRED TO SUBMIT AN INCIDENT REPORT CONCERNING MR. WILSON'S SAFETY ISSUES WITH MR. JONES, THAT WOULD BE PLACED IN THE P.C.O.C.S SYSTEM, AS THEY LANSTATED "REPORTABLE INCIDENTS" UNDER COOL AR #100-07 III. R.
  102. UNDER COOL AR #600-01 III. M. DEFENDANT SUGGS HAD THE AUTHORITY AND RESPONSIBILITY TO INITIATE THE CUSTODY ISSUE VALIDATION PROCESS, AND SUBMIT A "CUSTODY ISSUE" STATEMENT TO REPORT MR. WILSON'S SAFETY ISSUES WITH MR. JONES, THUS ENSURING MR. WILSON AND MR. JONES WOULD NOT BE HOUSD TOGETHER FORTHWITH.
  103. UNDER COOL ARS #600-01 III. O. AND #650-02 III. C. DEFENDANT SUGGS HAD THE AUTHORITY AND THE RESPONSIBILITY TO TEMPORARILY REMOVE MR. WILSON FROM BUCF INMATE POPULATION TO ENSURE HIS SAFETY UNTIL THE INVESTIGATION AND REVIEW PROCESS WAS COMPLETED, BECAUSE THERE WAS A "POTENTIAL OF SIGNIFICANT RISK" TO MR. WILSON'S SAFETY FROM MR. JONES.
  104. DEFENDANT SUGGS VIOLATED COOL ARS #100-07, #600-01, AND #650-02, BY FAILING TO (I) SUBMIT AN INCIDENT REPORT REGARDING MR. WILSON'S SAFETY CONCERNS, (II) INITIATE THE CUSTODY ISSUE VALIDATION PROCESS, OR (III) TAKE ANY STEPS TO TEMPORARILY REMOVE MR. WILSON FROM BUCF INMATE POPULATION TO ENSURE HIS SAFETY.
  105. DEFENDANT SUGGS FAILURE TO FOLLOW COOL POLICY, AND TAKE REASONABLE MEASURES TO ENSURE MR. WILSON'S SAFETY AFTER HIS DIRECT REPORTS EXPOSED MR. WILSON TO THE KNOWN EXTREME RISK OF SERIOUS HARM AT THE HANDS OF ANOTHER INMATE - WHICH ULTIMATELY RESULTED IN MR. WILSON BEING STABBED 11 TIMES BY MR. JONES ON JULY, 1ST 2023.

[ ATTACHED: COMPLAINT PG. 10 OF 11 ]

- M. MR. WILSON IS STABBED 11 TIMES BY MR. JONES.
106. ON OR ABOUT JULY 1ST, 2013, AT APPROXIMATELY 1:57 PM, IN THE 4P UNIT OF BULF MR. JONES TOLD MR. WILSON HE NEEDED TO SPEAK TO MR. WILSON PRIVATELY, IN THE CELL.
  107. MR. WILSON WAS NERVOUS TO ENTER THE CELL WITH MR. JONES DUE TO MR. JONES PLACING THE SHARPENED SCISSORS TO HIS NECK AND THREATS TO KILL HIM. HOWEVER MR. WILSON WAS LEFT BY HIMSELF TO ATTEMPT TO RESOLVE THE ISSUES WITH MR. JONES AND FELT HE HAD NO CHOICE BUT TO SPEAK TO MR. JONES.
  108. THE MOMENT MR. WILSON ENTERED THE CELL MR. JONES PULLED OUT THE SHARPENED METAL SCISSOR AND BEGAN TO STAB MR. WILSON, WHICH FORCED MR. WILSON TO DEFEND HIMSELF WITH UNARMED STRIKES AS MR. JONES PREVENTED MR. WILSON FROM EXITING THE CELL.
  109. FOR APPROXIMATELY 80 SECONDS MR. JONES ATTACKED MR. WILSON, STABBING MR. WILSON 11 TIMES WITH THE SHARPENED SCISSORS, AND MR. WILSON WAS FORCED TO GRAB MR. JONES BY THE WAIST TO PUSH HIS WAY OUT OF THE CELL.
  110. ONCE OUTSIDE THE CELL, IN CLEAR VIEW OF BULF STAFF, MR. WILSON SAW MR. JONES STILL STOOD IN FRONT OF HIM WITH THE SCISSORS AND DEFENDED HIMSELF WITH 2 CLOSED FIST PUNCHES, CHASING MR. JONES TO DROP THE SCISSORS, AND ANOTHER OFFENDER BROKE UP THE ATTACK ON MR. WILSON.
  111. MR. WILSON NOTICED NO BULF STAFF RESPONDING TO THE ATTACK FROM MR. JONES AND NOTICED THE 4P UNIT DOOR WAS OPEN AND APPROXIMATELY 9-12 BULF STAFF WERE IN THE OFFICE BUT DID NOT COME INTO THE HOUSING AREA TO INTERLUDE IN THE ATTACK.
  112. MR. WILSON WAS BLEEDING TO DEATH AND HAD A COLLAPSED LUNG FROM THE 11 STAB WOUNDS FROM MR. JONES AND WALKED TO THE OPEN UNIT DOOR, MARKED DOWN THE STAIRS AND REPORTED TO THE APPROXIMATELY 9-12 BULF STAFF THAT MR. JONES HAD JUST STABBED HIM AND HE NEEDED IMMEDIATE MEDICAL ATTENTION.
  113. THE 9-12 BULF STAFF WERE IN NO RUSH TO CALL FOR ANY EMERGENCY MEDICAL ATTENTION AND WAITED APPROXIMATELY 8 MINUTES BEFORE HAVING MEDICAL STAFF RESPOND, WHO FOUND MR. WILSON BLEEDING FROM STAB WOUNDS FROM HIS HEAD, NECK, LEFT ARM, LEFT HAND, AND UNDER HIS LEFT ARM PIT - WHICH PUNCTURED HIS LUNG.
  114. MR. WILSON WAS TAKEN TO THE HOSPITAL AND RECEIVED LIFE SAVING MEDICAL ATTENTION AND WAS ADMITTED UNTIL THE NEXT DAY, THEN MR. WILSON WAS TRANSFERRED TO THE INFIRMARY MEDICAL UNIT AT TERRITORIAL CORRECTIONAL FACILITY ("TCF") FOR A WEEK BEFORE BEING RETURNED TO BULF UNIT 4P.
  115. AFTER RETURNING TO BULF MR. WILSON CONTINUED TO BE PREVENTED FROM RECEIVING MENTAL HEALTH COUNSELING FOR THIS BRUTAL ATTACK AND WAS GIVEN NO PHYSICAL THERAPY OR ADDITIONAL SURGERY TO REHABILITATE AND ERECT INJURIES TO HIS BODY CAUSED BY THE STABBING.
  116. TO THIS DAY MR. WILSON SUFFERS FROM EMOTIONAL DAMAGE SUCH AS PARANOIA, PTSD, INSOMNIA, AND HAS VIVID NIGHTMARES OF THE ATTEMPT ON HIS LIFE.
  117. TO THIS DAY MR. WILSON SUFFERS FROM PHYSICAL DAMAGE SUCH AS CHRONIC SERIOUS MIGRAINES, SENSITIVITY TO LIGHT, HEARING LOSS IN HIS LEFT EAR FROM BLOWS RECEIVED FROM MR. JONES.
  118. MR. WILSON ALSO SUFFERS FROM LIMITED RANGE OF MOTION, WEAKNESS IN HIS LEFT ARM, AND HIS HIS SHOULDER "POPS" AND "GRINDS" PAINFULLY DUE TO ROTATOR CUFF CARTILAGE DAMAGE, CHRONIC NECK AND SPINAL PAIN THAT BECOMES DEBILITATING, WHICH LIMITS HIS MOBILITY AND PREVENTS HIM FROM SLEEPING OR SITTING FOR PERIODS EXCEEDING 80-90 MINUTES.
  119. MR. WILSON ALSO SUSTAINED PERMANENT NERVE DAMAGE TO HIS LEFT ARM, LEFT HAND, CHEST AND TORSO (LEFT ARMPIT AREA) THAT MANIFESTS AS NUMBNESS OR HYPERSENSITIVITY TO TOUCH AND HAS PERMANENT PHYSICAL DISFIGUREMENT FROM NUMEROUS SCARS DUE TO THE STAB WOUNDS.
  120. MR. WILSON HAS RECEIVED NO RESTITUTION OR COMPENSATION FROM THE CRIMINAL CASE BROUGHT AGAINST MR. JONES FOR THE MURDER ATTEMPT ON HIS LIFE.

(ATTACHED: COMPLAINT PG. 11 OF 11)

Free form provided to Wilson #117681 by CDCC Legal Services on 12/3/2024

**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): SEE ORIGINAL COMPLAINT

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)

**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): SEE ORIGINAL COMPLAINT

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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**

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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**

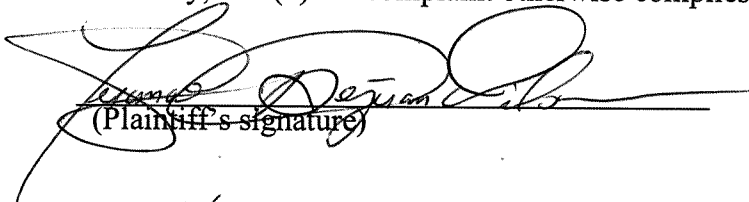
State the relief you are requesting or what you want the court to do. If additional space is needed to identify the relief you are requesting, use extra paper to request relief. Please indicate that additional paper is attached and label the additional pages regarding relief as "G. REQUEST FOR RELIEF."

- (A) APPROPRIATE RELIEF AT LAW AND EQUITY;
- (B) ECONOMIC LOSSES ON ALL CLAIMS ALLOWED BY LAW;
- (C) ALL COMPENSATORY DAMAGES AND CONSEQUENTIAL DAMAGES ALLOWED BY LAW IN AN AMOUNT TO BE DETERMINED AT TRIAL, INCLUDING BUT NOT LIMITED TO DAMAGES FOR EMOTIONAL DISTRESS, HUMILIATION, LOSS OF ENJOYMENT OF LIFE, ILL HEALTH, DISABILITY, DISFIGUREMENT, DISCOMFORT, THE REASONABLE EXPENSE OF MEDICAL OR PSYCHOLOGICAL CARE IN THE PAST, PRESENT, AND FUTURE;
- (D) PUNITIVE DAMAGES ON ALL CLAIMS ALLOWED BY LAW AND IN THE AMOUNT TO BE DETERMINED AT TRIAL;
- (E) PRE- AND POST-JUDGEMENT INTEREST AT THE HIGHEST LAWFUL RATE;
- (F) ANY FURTHER RELIEF THAT THIS COURT DEEMS JUST AND PROPER; AND
- (G) ANY OTHER RELIEF AS ALLOWED BY LAW.

PLAINTIFF HEREBY DEMANDS A JURY TRIAL ON ALL ISSUES SO TRIABLE.  
**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)

3/1/25  
(Date)

(Revised November 2022)

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901 19th Street, Room A105  
Denver, Co 80294-3589

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