

Please Read Instructions on Reverse Side of Yellow Copy

Please print in ink or type

Arkansas State Claims Commission

APR 18 2014

F1

BEFORE THE STATE CLAIMS COMMISSION Of the State of Arkansas

RECEIVED

- Mr. Mrs. Ms. Miss

Tim Axelson, #097108, Claimant

vs.

State of Arkansas, Respondent Dept. of Corr.

Do Not Write in These Spaces. Claim No. 14-0816-CC. Date Filed April 18, 2014. Amount of Claim \$ 15,000.00. Fund DOC.

COMPLAINT

Negligence, Personal Injury, Pain & Suffering, Mental Anguish, Failure to Follow Procedure

Tim Axelson, #097108, the above named Claimant, of POB 600, Grady, AR 71644

(State) (Zip Code) (Daytime Phone No.) County of represented by (Legal Counsel, if any, for Claim)

of (Street and No.) (City) (State) (Zip Code) (Phone No.) (Fax No.) says:

State agency involved: Arkansas Department of Correction Amount sought: \$15,000 Fifteen Thousand

Month, day, year and place of incident or service: Feb, 10th, 2013

Explanation: 1 While incarcerated at The Arkansas Department of Correction's (A.D.C.), Varner Unit, on Feb, 10, 2013 at approximately 4:30 PM, I was brutally assaulted. 2 Co I Motherhead was supervising four segment barracks 13 by themselves which consist of approximately 50 inmates each for a total of 200 inmates for Barracks 19, 20, 21, and 22. 3 IT is the norm at this unit for one guard to supervise four barracks, and control the halls all by themselves approximately all day, seven days a week, 365 days a year, this is a violation of A.D.C. Policy's. 4 I was housed in 22 Barracks when officer Motherhead failed to photo I.D. A inmate from 7 Barracks, allowing him to enter into 22 Barracks, against long standing policy I.O. Security Manual and post orders. 5 I was brutally assaulted, while sitting at my bench, I was hit with a gloved fist in my eye and head for approximately 15 blows, as I turned to the brick wall and went turning my back to my attacker shielding my bloodied face. (See Page 2-3)

As parts of this complaint, the claimant makes the statements, and answers the following questions, as indicated: (1) Has claim been presented to any state department or officer thereof?

no; when? (Month) (Day) (Year); to whom? (Department)

and that \$ was paid thereon: (2) Has any third person or corporation an interest in this claim?; if so, state name and address

and that the nature thereof is as follows: (Name) (Street or R.F.D. & No.) (City) (State) (Zip Code)

: and was acquired on in the following manner:

THE UNDERSIGNED states on oath that he or she is familiar with the matters and things set forth in the above complaint, and that he or she verify believes that they are true.

Tim Axelson (Print Claimant/Representative Name) Tim Axelson (Signature of Claimant/Representative)

SWORN TO and subscribed before me at Grady (City) Ark (State)

Edward Lane Notary Public on this 14th day of April 2014. State of Arkansas Lincoln County Commission # 12362690

Commission Expires July 20, 2017 My Commission Expires: July 20 2017 (Notary Public)

Major K Bolen, Warden Watson, deputy warden Moses Jackson and Director Ray Hobbs, who are aware that one correctional officer can't adequately supervise four barracks and control the Hall by them self, by policy there is suppose to be supervised by two correction officers and a sergeant.

⑩ The officers took photos of me and my Beard, The inmate that assaulted me is on video And the Affidavits, Reports, infirmary visits and Policy's 9.1.0, 9.3.0, is the property of the A.D.C. According to Policy 800.00 Inmates cannot obtain this information, Claimant Request the claims committee obtain said documents

⑪ Wherefore the claimant pray that this commission for the above stated reasons, Policy's Violation's Gross and habitual negligence, and any other Just reasons the commission detect grant the claimant His Requested Relief of 15,000 Fifteen thousand dollars,

Respectfully

Tim Axelson

Tim Axelson 97108

P.O. Box 600

Grady AK 71644

BEFORE THE ARKANSAS STATE CLAIMS COMMISSION

TIM AXELSON (ADC 097108)

CLAIMANT

V.

NO. 14-0816-CC

ARKANSAS DEPARTMENT OF CORRECTION

RESPONDENT

ANSWER

COMES NOW the Respondent, Arkansas Department of Correction, and for its Answer, states and alleges as follows:

1. Respondent denies liability in this claim and asserts it will hold the Claimant to strict proof on each allegation unless admitted by Respondent. Respondent reserves the right to plead further upon completion of the investigation by internal affairs and requests the matter be held in abeyance until the investigation is complete.
2. The applicable account information required by the Commission is:
 - a. Agency number: 0480
 - b. Cost Center: HCA0100
 - c. Internal Order: 340301
 - d. Fund Center: 509

WHEREFORE, for the reasons cited above the Respondent prays that the claim be dismissed with prejudice and that Claimant take nothing, or in the alternative that the matter be held in abeyance until completion of the investigation by internal affairs.

Respectfully submitted,
Department of Correction Office of Counsel

Lisa Mills Wilkins
LISA MILLS WILKINS Ark. Bar #87190
Attorney Supervisor
Post Office Box 8707
Pine Bluff, AR 71611
(870)267-6844 Office
(870)267-6373 Facsimile

Arkansas
State Claims Commission

APR 23 2014

RECEIVED

CERTIFICATE OF SERVICE

I certify that a copy of this pleading has been served this 22 day of April, 2014, on the Claimant by placing a copy of the same in the U. S. Mail, regular postage to:

Tim Axelson (ADC 097108)
Varner Unit
PO Box 600
Grady, AR 71644-0600

Lisa Mills Wilkins
LISA MILLS WILKINS Ark. Bar #87190

BEFORE THE ARKANSAS CLAIMS COMMISSION

TIM AXELSON #971087

v.

ARKANSAS DEPARTMENT OF CORRECTION

RESPONDENT

STATEMENT OF UNDISPUTED FACTS

Comes now your claimant Tim Axelson with the above-styled cause of action and for this motion he does so state:

A.

This claim was filed April 18, 2014 based on negligence by the State who violated thier own policies and practices in failing to protect claimant Axelson from assault by another prisoner not assigned to his barracks.


B.

After discovery admissions having been filed and responded to, the following statements are sought to be accepted/adopted as undisputed facts:

1. On 2/10/13 claimant was housed as an ADC inmate at Varner Unit, Barracks No. 22.
2. On 2/10/13 ADC Correctional Officer (C.O.) Mothershed was assigned the post of Barrack 19, 20, 21 and 22 where she maintained constant visual observation as security and held the keys to these barracks in order to check inmates in or out of their respective barracks.
3. On 2/10/13 an inmate not assigned to Barracks 22 did enter that barracks and assault claimant repeatedly.
4. Entry into Barracks 22 can only be done by allowance of the correctional officer turning the key.

5. On 2/10/13 Correctional Officer Mothershed witnessed your claimant bleeding and did immediately call for back-up.
6. On 2/10/13 claimant was treated for injuries by infirmary personell.
7. It was only after the 2/10/13 incident that claimant persistently sought medical treatment for excessive headaches.
8. ADC policy requires inmates entering or exiting a barracks to be checked off against a barracks roster.
9. The respondent State negligently violated their policy when an inmate not assigned to Barracks No. 22 was allowed entry into Barracks No. 22.
10. As a direct and proximate cause of State negligence your claimant Tim Axelson has suffered assault from a prisoner not assigned to his barracks.

Respectfully Submitted,

 7-15-14

Tim Axelson, ADC #97108
Varner Unit
P.O. Box 600
Grady, AR 71644

Arkansas
State Claims Commission

JUL 22 2014

RECEIVED

CERTIFICATE OF SERVICE

I, Tim Axelson, do hereby certify that a true and correct copy of the enclosed documents have been sent to the Respondent - Lisa M. Wilkins, Attorney Supervisor, P.O. box 8707, Pine Bluff, AR 71611, via U.S. Mail on 7-15-2014 with proper postage affixed.



Tim Axelson ADC #97108
Varner Unit
P.O. 600
Grady, AR 71644

*File marked copy sent 7-23-14
— JW

Arkansas
State Claims Commission

JUL 22 2014

RECEIVED

Claims Commission
Attn. Norman Hodges Jr.
101 East Capitol Ave., Suite 410
Little Rock, AR 72201-3823

RE: Tim Axleson
Claim No. 14-0816-CC

July 15, 2014

Arkansas
State Claims Commission

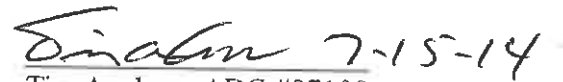
JUL 22 2014

RECEIVED

Dear Ms. Hodges:

Enclosed please find the original and one copy of Claimant's Statement of Undisputed Facts. Please file the original and return a file marked copy to me. I am providing the Respondent with a copy of this letter along with my Statement of Undisputed Facts.

Respectfully,

 7-15-14

Tim Axelson ADC #97108
Varner Unit
P.O. 600
Grady, AR 71644

Lisa Mills Wilkens
P.O. Box 8707
Pine Bluff, AR 71611-8707

Arkansas
State Claims Commission
JUL 22 2014
RECEIVED
CLAIMANT

BEFORE THE STATE CLAIMS COMMISSION

TIM AXELSON (ADC #97108)

CASE NO. 14-00816-CC

ARKANSAS DEPT. OF CORRECTION

RESPONDENT

INTERROGATORIES

INTERROGATORY NO. 1

Would the Respondent ADC provide the name of the inmate found guilty of assaulting Claimant on 2/10/2013?

INTERROGATORY NO. 2

Has Respondent ADC placed the Assailant on Claimant's current "Enemy Alert List" as of this date?

INTERROGATORY NO. 3

Did ADC employee C.O. Mothershed negligently open the door and allow an inmate not assigned to 22 Barracks into that barracks on 2/10/13 where Claimant was then assaulted?

INTERROGATORY NO. 4

Did Respondent ADC write a disciplinary on the inmate who assaulted Claimant on 2/10/2014?

INTERROGATORY NO. 5

Would Respondent ADC produce and provide for this Commission and Claimant an exact true copy of any disciplinary written on 2/10/2013 (or thereabouts) concerning the assault on Claimant?

Arkansas
State Claims Commission
JUL 22 2014

RECEIVED

INTERROGATORY NO. 6

Did ADC surveillance cameras catch the unauthorized inmate leaving Barracks 22 on 2/10/2013?

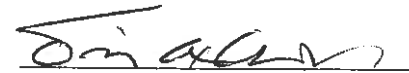
REQUEST FOR PRODUCTION OF DOCUMENTS #1

Please produce for the Commission to review a true copy of Correctional officer's post orders for Varner Unit, Barracks 19 - 22.

REQUEST FOR PRODUCTION OF DOCUMENTS #2

Please produce for the Commission to review all documents, reports and infractions relevant to the incident alleged 2/10/2013.

7-15-14
DATE


Claimant/Tim Axelson

*File marked copy sent
7-23-14
ju

CERTIFICATE OF SERVICE

I, Tim Axelson, do hereby certify that a true and correct copy of the enclosed documents have been sent to the Respondent - Lisa M. Wilkins, Attorney Supervisor, P.O. box 8707, Pine Bluff, AR 71611, via U.S. Mail on 7-15-2014 with proper postage affixed.



Tim Axelson ADC #97108
Varner Unit
P.O. 600
Grady, AR 71644

Arkansas
State Claims Commission

JUL 22 2014

RECEIVED

BEFORE THE ARKANSAS STATE CLAIMS COMMISSION

TIM AXELSON (ADC #97108)

CLAIMANT

V.

NO. 14-0816-CC

ARKANSAS DEPARTMENT OF CORRECTION


RESPONDENT

RESPONSE TO INTERROGATORIES

COMES NOW the Respondent, Arkansas Department of Correction, and for its Response to Interrogatories, states and responds as follows:

1. Response to Interrogatory No. 1: Yes
2. Response to Interrogatory No. 2: Yes
3. Response to Interrogatory No. 3: Objection. This calls for a legal conclusion.
4. Response to Interrogatory No. 4: Objection. Claimant is not entitled to information regarding disciplinary action taken on other inmates.
5. Response to Interrogatory No. 5: Respondent will comply with any request of the commission.
6. Response to Interrogatory No. 6: Yes
7. Response to Request No. 1: Objection as to relevance and not likely to lead to any relevant information.
8. Response to Request No. 2: See RFP #1

Respectfully submitted,
Department of Correction
Office of Counsel


LISA MILLS WILKINS Ark. Bar #87190
Attorney Supervisor
Post Office Box 8707
Pine Bluff, AR 71611
(870)267-6844 Office
(870)267-6373 Facsimile

CERTIFICATE OF SERVICE

I certify that a copy of the DISCOVERY RESPONSE has been served this 15 day of Sept, 2014, on the Claimant by placing a copy of the same in the U. S. Mail, regular postage to:
TIM AXELSON (ADC #97108)
Varner Unit
P. O. Box 600
Grady, AR 71644-0600


LISA MILLS WILKINS Ark. Bar #87190

Arkansas
State Claims Commission
SEP 16 2014
RECEIVED



ADMINISTRATIVE REGULATIONS
STATE OF ARKANSAS
DEPARTMENT OF CORRECTION

Section Number: 005/409	Page Numbr. 005-3 of 3 409-9 of 9
Board of Correction Approval Date: 9/23/87	
Supersedes: 005/409 Form	Dated: 12/19/85
Attorney General Review Date: 6/11/87	Date Filed Secy. of State: 10/02/87

005 Incident Report
and
409 Use of Force

SUBJECT: Reporting of Incidents — 005; Use of Force — 409

Varner Unit
UNIT/DIVISION

REPORTING EMPLOYEE: Copper LAST FIRST M MIDDLE

RANK: Captain SHIFT ASSIGNMENT: A

DATE: 02/13/13 TIME: APX 3:00 PM LOCATION: Zone 3, 22 Bks

INMATE(S) INVOLVED: Session, Dominic ADC# [redacted], Axelson, Timothy ADC# 97108, Adams/Valachi, Michael ADC# [redacted]

EMPLOYEE(S) INVOLVED: Captain William Cooper (Names, Titles, Rank)

INMATE(S) PRESENT: Same as above (Names and ADC Numbers)

EMPLOYEE(S) PRESENT: Same as above (Names, Titles, Rank)

OTHERS PRESENT/INVOLVED: (Specify) N/A (Names & Addresses)

EXTENT OF INJURY TO INMATE(S): N/A

TREATMENT AFFORDED INMATE(S): MSF 205

EXTENT OF INJURY TO OFFICER(S): N/A

TREATMENT AFFORDED OFFICER(S): N/A



RFP
1

STATEMENT OF FACTS (If forced, state type and explain): _____

On 2-10-13 at approximately 5:00 Pm I, Captain [redacted] Conner began an official investigation into a physical altercation that occurred in Zone 3, Barracks 22. On 2-13-13 at approximately 3:00 Pm I concluded my investigation. after interviewing inmates assigned to 22 Barracks, collecting verbal and written witness statements and reviewing the video surveillance cameras I determined that the following events took place: on 2-10-13 during the feeding of the evening meal Inmate Session, Dominic ADC# [redacted] left the chow hall, Zone 2 and proceeded down the north hall. Inmate Session then gained entrance into 22 Barracks. Once Inmate Session entered 22 Barracks he approached Inmate Axelson, Timothy ADC# 97108 who was sitting on his assigned bed, called him a "snitch" and struck Inmate Axelson with a closed right fist, Inmate Session then continued his assault on Inmate Axelson by striking him with closed fist and kicking him with his feet. Inmate Session then removed his bloody state issue shirt and concealed it in the laundry bag and pushed Inmate Adams/Valachi, Michael ADC# [redacted] who is in a wheel chair to 22 Barracks door and informed staff that Inmate Adams/Valachi needed to go to the infirmary in order to exit the barracks. Inmate Session then returned to his assigned barracks. Both inmates were seen by medical staff and placed in isolation. Therefore, due to the above stated facts I, Captain [redacted] Conner am charging Inmate Session, Dominic ADC# [redacted] with rule violation [redacted]

Signature of Reporting Employee: [Signature] Date: 13-Feb-13 Signature of Supervisor: _____ Date: _____

Reviewed by (Signature) Warden/Center Supervisor/Administrator: _____ Date: _____

RECOMMENDATION: _____

Reviewed by (Signature) Assistant Director: _____ Date: _____

RECOMMENDATION: _____

Reviewed by (Signature) Director: _____ Date: _____

DISTRIBUTION OF COPIES:

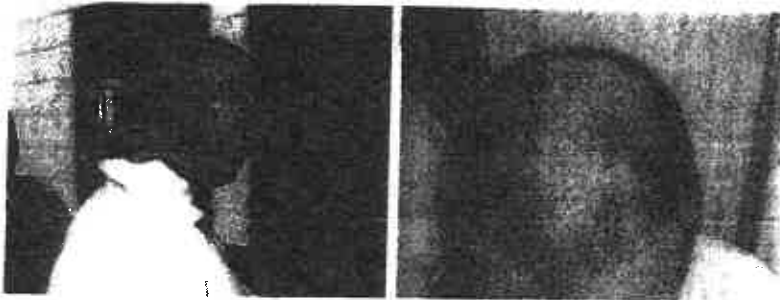
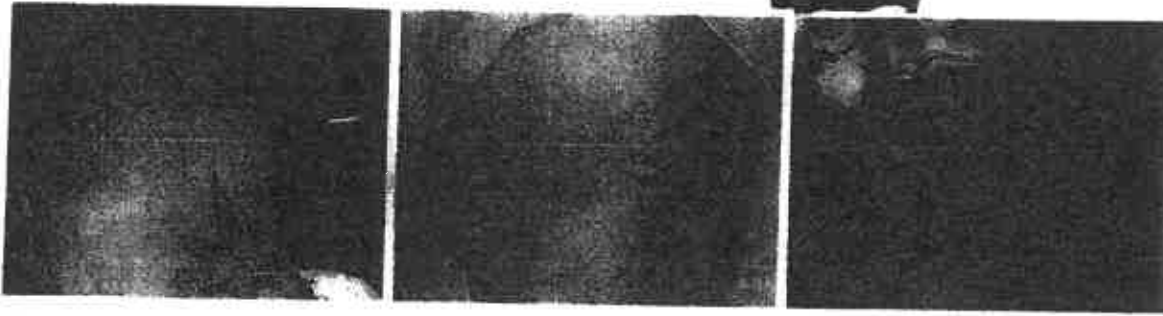
- Original to Assistant Director, then to Director, and then to Inmate Institutional File.
- Assistant Director
- Warden/Center Supervisor/Administrator

INCRPTdb

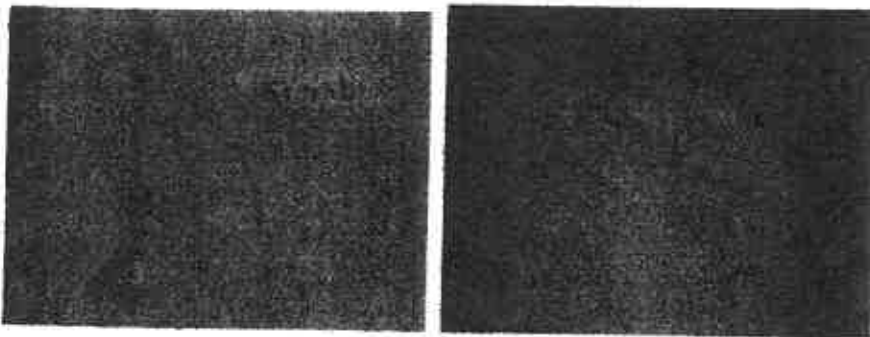
(Revised

2-10-2013

Inmate Timothy Axelson #97108 was assaulted in 22 bks (Zone 3) by inmate
Dominic Session [REDACTED]



Shirt found in laundry bag belong to inmate Dominic Session [REDACTED]



STATE OF ARKANSAS - DEPARTMENT OF CORRECTION
CONFISCATED FORM - AREA OR PERSON

F-401

(Check One) Inmate Visitor Staff Area

Unit: Unit Building or Area: Zone 3 Barracks: 22 Cell:

Date and Time of Search: 11/10/07 1:00 pm am

Officer(s) Conducting Search (Print): [Signature]

Officer(s) Conducting Search (Signature): [Signature]

Inmate Name: 22 [Signature] ADC #:

Articles Seized (description and number of items):

Number	Description

Reason Seized: Excess/Unauthorized Property Disciplinary/Criminal Evidence
 Other:

Inmate Signature: [Signature] () Refused to Sign

Area/Shift/Supervisor (Signature): [Signature]

Disposition of Contraband: [Signature]

Copy Delivered to Inmate: Date: 11/10/07 Time: 2:00

Delivered By (Signature): [Signature]

Disciplinary Written () No () Yes By: [Signature]

Articles may be mailed to:

Inmate authorizes deduction of postage from pen store account
() No () Yes Inmate Signature:

To be completed by UPCO

Destruction Date:

UPCO (Signature): Witnessing Staff (Signature):

Distribution - White-Remains with Contraband, Yellow- Institutional File, Pink-Inmate Copy
(To Be Printed On NCR Paper)

F-401

Revised 8/28/2006

16

STATE CLAIMS COMMISSION DOCKET
OPINION

Amount of Claim \$ 15,000.00

Claim No. 14-0816-CC

Tim Axelson, #097108 Claimant

Attorneys
Pro se Claimant

vs.

AR Department of Corrections
State of Arkansas Respondent

Lisa Wilkins, Attorney
Respondent

Date Filed April 18, 2014

Type of Claim Negligence, Personal Injury, Pain & Suffering, Mental Anguish, Failure To Follow Procedure

FINDING OF FACTS

This claim was filed for negligence, personal injury, pain & suffering, mental anguish and failure to follow procedure in the amount of \$15,000.00 against Arkansas Department of Corrections.

Present at a hearing March 13, 2015 was the Claimant, pro se, and the Respondent, represented by Lisa Wilkins, Attorney.

After considering testimony given by both the Claimant and the Respondent, the Claims Commission found that the officer in charge of the area in question was negligent for allowing an inmate without proper I.D. to pass through multiple portals(guards stations), to reach the Claimant resulting in the Claimant being severely beaten. As a result the Claimant was left with permanent head injuries and scarring. The Claimant demonstrated the ADC's failure by presenting at the hearing with a sweatshirt with another inmates name clearly stamped on the shirt. The Claims Commission unanimously awarded the Claimant the amount of \$1,000.00.

The Claims Commission hereby unanimously awards this claim in the amount of \$1,000.00 and hereby directs the Claims Commission Clerk to issue a voucher in payment thereof.

IT IS SO ORDERED.

(See Back of Opinion Form)

CONCLUSION

Upon consideration of all the facts, as stated above, the Claims Commission hereby unanimously awarded this claim in the amount of \$1,000.00 and hereby directs the Claims Commission Clerk to issue a voucher in payment thereof.

Date of Hearing March 13, 2015

Date of Disposition March 13, 2015

[Signature] Chairman
[Signature] Commissioner
[Signature] Commissioner

IN THE CLAIMS REVIEW SUBSOMMITTEE
OF THE ARKANSAS GENERAL ASSEMBLY

TIM AXELSON (ADC #097108)

V.

NO. 14-0816-CC

ARKANSAS DEPARTMENT OF CORRECTION

Arkansas CLAIMANT
State Claims Commission

MAR 25 2015

RESPONDENT
RECEIVED


NOTICE OF APPEAL

COMES NOW the Respondent, Arkansas Department of Correction, and for its Notice of Appeal, states and alleges as follows:

Notice is hereby given that the Respondent is appealing the granting of the decision by the Arkansas State Claims Commission rendered March 13, 2015, in the above matter to the General Assembly of the State of Arkansas in accordance with Arkansas Statute 19-10-211.

Respondent hereby designates the entire record, and all proceedings, exhibits, evidence and documents introduced in evidence to be contained in the record on appeal.

Respectfully submitted,
Department of Correction Office of Counsel


LISA MILLS WILKINS Ark. Bar #87190
Attorney Supervisor
Post Office Box 8707
Pine Bluff, AR 71611
(870)267-6844 Office
(870)267-6373 Facsimile

CERTIFICATE OF SERVICE

I certify that a copy of the NOTICE OF APPEAL has been served this 25 day of March, 2015, on the below Claimant by placing a copy of the same in the U. S. Mail, regular postage to:

TIM AXELSON (ADC #097108)
VARNER UNIT
P. O. BOX 600
GRADY, AR 71644-0600


LISA MILLS WILKINS Ark. Bar #87190

Arkansas Claims Commission
IN THE CLAIMES REVIEW SUBCOMMITTEE
OF THE ARKANSAS GENERAL ASSEMBLY

APR 16 2015

RECEIVED

TIM AXELSON #97108

CLAIMANT

V.

NO 14-0816-LL

ARKANSAS DEPARTMENT OF CORRECTION

RESPONDENT

NOTICE OF APPEAL

COMES NOW the claimant TIM AXELSON and for his
Notice of Appeal, Pleas and states the Following:

Notice is hereby Giving That the claimant is appealing
The Granting of the decision by the Arkansas state
claimes commission. IN Regards to the dollar amount
of \$1,000 that was Rendenderd on march-13-2015, The
claimant origerally Had prayed For \$15,000, The claimant
Request that the Above matter Be Appealed to the
General Assembly of the state of Arkansas in accordance
with Arkansas statute 19-10-211 The claimant pleas
The Following:

① The Respondent's Admitted Guilt IN their Admissions,
Interrogatory's And in pleading their case at the Hearing
on 3-13-15

② Two years After the 2-10-13 Asult on the claimant,
He demonstrated at the Hearing on 3-13-15, That the A.D.C.

still dose not inspect each Inmate For proper photo I'd's and clothing with their names stenciled, while Entering and Exiting the oppen Barraks at Varner unit

③ This Commission Granted Kevin Williams malite \$ 30,000 dollars in october of 2013 For the same Exact security Breach, that took place at the Brichley unit, After this the Brichley unit dont Have these tyys of Assaults on Inmates, Because they Have a Inmate ID. System For each Barraks,

④ The claimant Has permanent Head Injuries and Scarring The \$1,000 dollars will not cover Future doctor visits, Ct scans, and medacation, After the claimant is Released

⑤ The pain and suffering is a dayley Accurance, \$1,000 dollars is not suffircent to cover a lifetime of dayley Headates, Flash Backs, Looking in the mirra, and living in Fear, while Being At Varner unit, That this could happen aggear as it dose contunwisuly at the Varner unit.

⑥ Officer Mothershead was negligent And the claimant Has and still is suffering, The claimant should Be Granted the \$15,000 For His suffering dayley Because Mothershead and the A.D.C. Faled to Followed their own Policies.

⑦ The claimant designates the Entire Record's, and all proceedings, Exhibits Evidence, and documents introduced in Evidence, along with a taping of the Hearing on 3-13-15 to be contained in the Record on Appeal claimant is also Adding 2 Exhibits, that are on Record From the 3-13-15 Hearing

WHEREFORE The claimant pray that this General Assembly Award the claimant His original dollar amount sought \$15,000

Respectfully submitted

Tim Axelson

Tim Axelson #97108

P.O. Box 600 4-14-15

Grady AR 71644

Certificate of Service.

I Hereby certify that a copy of this notice of Appeal has been sent to Lisa Mills Wilkins on this 14 day of April 2015 By US Mail First class postage to the Address listed Below.

Lisa Mills Wilkins
Attorney Supervisor
Postoffice Box 8207
Pine Bluff, AR 71611

Floor Plan of North Hallway Varner Unit Showing Barracks, Chowhall, Master Control, Riot Gates and Security Posts (all side offices and rooms not shown).

FOR STATE CLAIMS COMMISSION: CASE NO: 14-0816-CC
 ← Axelson's Barracks

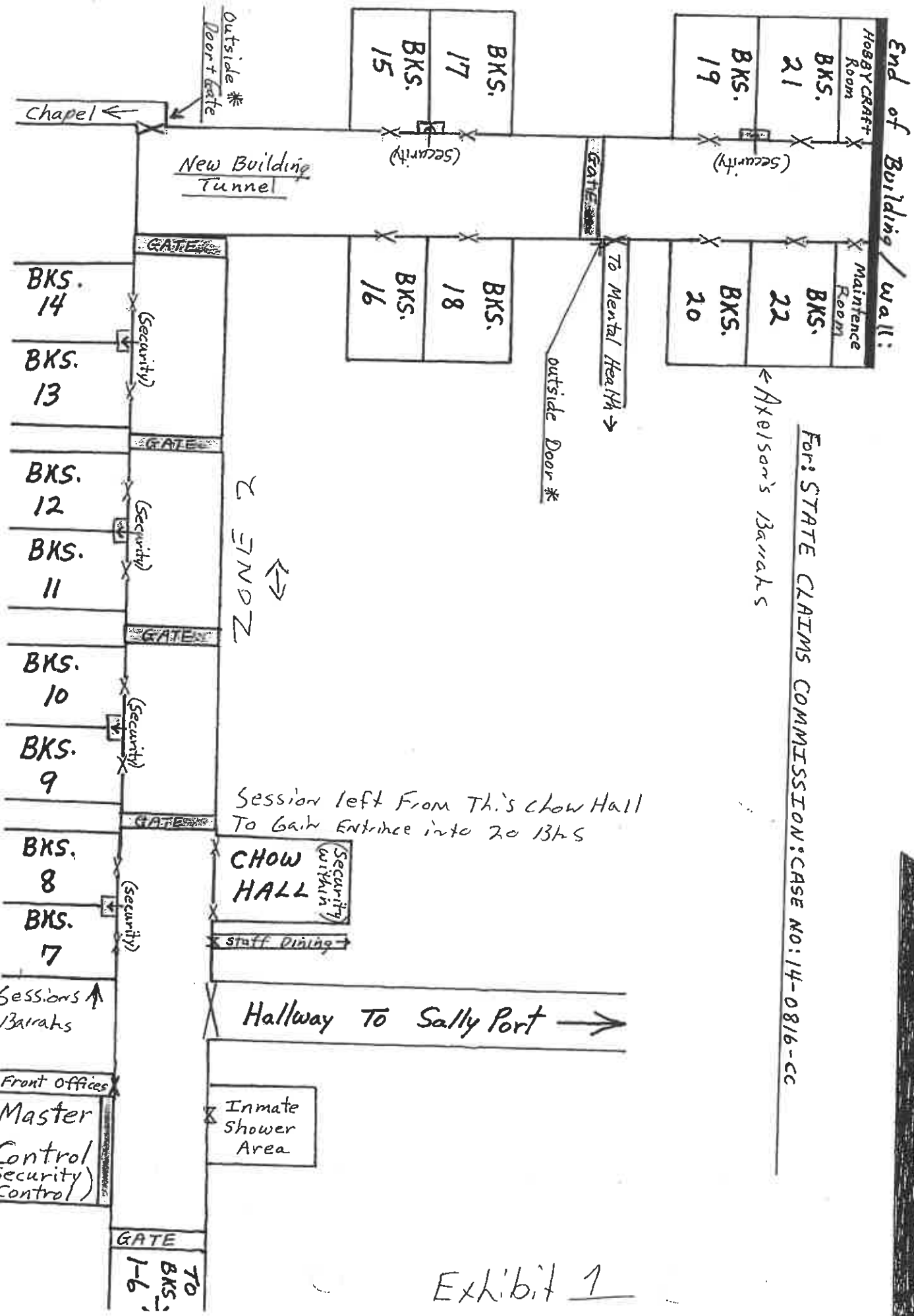


EXHIBIT 1

TIMELINE OF EVENTS
Sick Call - Pre Lockup

DATE	DESCRIPTION
2/7/13	Altercation with Walker?
2/10/13	Pre-Lockup for Assault by Session. Complained about headaches and dizziness that started occurring after Session Assaulted.
2/12/13	Headaches, Dizziness and Blurred Vision along with Confusion due to altercation.
2/17/13	Headaches, Dizziness and Blurred Vision continues after both altercations.
3/3/13	Headaches, Dizziness and Blurred Vision continue.
3/4/13	Pre-Lockup. Do to fight with Hunter.
3/11/13	Headaches, Dizziness and Blurred Vision continue after being assaulted twice and suffering more than 50 blows to the head within 20 days.
3/22/13	Headaches, Dizziness and Blurred Vision continue after being in 3 fights. Continues to seek treatment for symptoms.
4/3/13	Headaches continue after 3 altercations. Pain meds are not working.
4/17/13	Headaches continue and right ear is ringing.
8/14/13	Headaches and Ear Ringing continue - out of meds.
9/18/13	Headaches and Ear Ringing continue.
10/22/13	Ear Ringing continues
10/27/13	Ear Ringing continues.
1/2/14	Need meds for headache and right ear ringing.
1/27/14	Headache worsens due to odor after being moved to a cell that has been set on fire.
1/31/14	After complaining from being in a burned out cell (Evidently moved?) - Headaches are now normal.
2/10/14	Headaches and Ear Ringing continue. Meds are no longer working.
5/16/14	Headaches and Ear Ringing are worsening
7/16/14	Headaches and Ear Ringing continue. Meds are no longer working.
7/24/14	After complaining that the New Meds are not working, the New Meds are discontinued altogether. Still having Headaches.
7/27/14	No Meds are working. Still having Headaches.

The below is a list of the prescribed medications that I am taking:

- Ibuprofen/600mg (for headaches)
- APAP-Aspirin-Caffeine 250-250-65/mg (for headaches)
- Acetaminophen/500mg (for headaches)
- Sumatriptan Succinate/25mg

The claimant has 14 more visits to sick call concerning his headaches that are not on this list. 7-27-14 was the last time he received

Exhibit 2