

Rebuttal Expert Report of Brie Williams, M.D., M.S.

Parsons v. Ryan, No. 2:12-cv-00601-NVW (MEA) (D. Ariz.)

January 31, 2014

From his report, it does not appear that Dr. Mendel interviewed or reviewed the medical records of the prisoners discussed in my report. It also does not appear that he viewed the cells in ADC's isolation units, or the exercise facilities available to prisoners in those units. Nor does Dr. Mendel cite any medical literature in support of his conclusions.

Dr. Mendel criticizes my report for failing to address "the reason for the inmate's placement in a disciplinary unit," repeatedly referring to the units I inspected as "disciplinary units."¹ It is my understanding that these units serve a broader function than "disciplinary units" since the defendants' expert Richard Seiter explained that prisoners may be housed in these units for several reasons including because of the sentence they have received, because they are in protective custody, or for other reasons unrelated to any misconduct while in prison.² For this reason, it appears that Dr. Mendel's assumption that all prisoners in these units are there for disciplinary reasons is incorrect.

Dr. Mendel also states that I do not "list any experience providing care to incarcerated individuals."³ I have served as a consultant in California's San Quentin State Prison where I consulted on the care of patients age 50 and older.

Dr. Mendel also states that "Dr. Williams did not list the mental health history for any of the inmates mentioned in her report," and states that due to this alleged failure "it is not possible to determine whether it is safe to allow disciplinary unit inmates to exercise with others."⁴ First, it is simply untrue that I did not discuss prisoners' mental health history. For example, I note in the body of my report that one prisoner "has a history of Post-Traumatic Stress Disorder with suicidal ideation,"⁵ and in my notes (which constitute a part of my report) I repeatedly refer to prisoners' mental health diagnoses and treatment.

More fundamentally, it is not my opinion that prisoners must always be allowed to exercise with others. Rather, my opinion is that the denial of access to exercise spaces that allow sustained walking, and/or the housing of prisoners in conditions that contribute to social isolation or sensory deprivation, poses a substantial risk of serious harm to older prisoners and those with chronic medical conditions, and/or physical disabilities.

Dr. Mendel states that I do not discuss the length of time prisoners spend in isolation. It is my understanding that ADC surprisingly does not track the mean or median length of prisoners' stay in isolation.⁶ I have not found evidence that there is any upper limit on the

¹ Mendel Report at 34-36.

² Seiter Report at 1-2.

³ Mendel Report at 33.

⁴ Mendel Report at 34.

⁵ Williams Report at 16.

⁶ Defendant Charles Ryan's Responses to Plaintiff Robert Gamez's First Set of Interrogatories, September 16, 2013, Interrogatory No. 2.

amount of time an Arizona prisoner can spend in isolation, and ADC states that “Inmates serving death or life sentences could be housed in a location meeting Plaintiffs’ definition of ‘ISOLATION’ for upwards of 20 years.”⁷ It is my understanding that prisoners who are sentenced to death are automatically and permanently classified as maximum custody (and therefore placed in isolation), and prisoners with life sentences are automatically so classified for a minimum of two years.⁸ Thus, I am told by Plaintiffs’ attorneys that ADC policy requires that these prisoners spend a minimum of two years in ADC’s isolation units.⁹

In addition, ADC’s website indicates that many of the prisoners in ADC’s isolation units have been housed in those units for many months or even years. The website’s “Inmate Datasearch” function lists the date of a prisoner’s last movement. Listed below are some of the prisoners I interviewed in ADC’s isolation units during my inspection tours on August 14, 15, and 16, 2013. For each prisoner is listed the housing unit where I interviewed the prisoner and the date of his or her last movement, as indicated on ADC’s website on December 27, 2013.

<u>Name and ADC No.</u>	<u>Unit where interviewed</u>	<u>Last movement as of 12/27/13</u>
[REDACTED]	Lumley-SMA	1/6/10
[REDACTED]	Lumley-SMA	12/17/10
[REDACTED]	Eyman-SMU	7/28/11
[REDACTED]	Eyman-SMU	8/14/12
[REDACTED]	Eyman-SMU	8/29/12
[REDACTED]	Eyman-Browning	8/30/12
[REDACTED]	Lumley-SMA	10/4/12
[REDACTED]	Florence-Central	12/6/12
[REDACTED]	Florence-Central	3/28/13
[REDACTED]	Eyman-SMU	5/6/13
[REDACTED]	Eyman-SMU	6/22/13

⁷ Ibid.

⁸ Plaintiff Dustin Brislan’s First Requests for Admissions and Defendants Ryan’s Response Thereto, September 24, 2012, Requests No. 25, 26.

⁹ According to the report of Richard Seiter, as of August 22, 2013, ADC had 121 prisoners sentenced to death, and 101 sentenced to life who had served less than two years. Seiter Report at 2.

[REDACTED]	Eyman-SMU	7/8/13
[REDACTED]	Florence-Central	7/18/13

The December 27, 2013 printouts for these prisoners from ADC's "Inmate Datasearch" function are attached as Exhibit A.

It is also my understanding that some of the named plaintiffs have spent years in ADC's isolation units. For example, it appears that Robert Gamez was incarcerated at Florence-Central Unit from 2007 to 2012, and has been at Eyman-Browning Unit since that time.¹⁰ It appears that Jackie Thomas has been incarcerated at either Eyman-Browning or Eyman SMU since 2007.¹¹

The risks and negative health effects of enforced idleness and lack of exercise occur quite rapidly. After five weeks of bedrest, decreased muscle mass in the lower extremities and bone mineral loss can be detected, as can hip, thigh, and calf muscle atrophy and bone loss.¹² As little as two weeks of bedrest has been found to launch the catabolic response that leads to muscle breakdown in healthy, younger volunteers.¹³

These risks and adverse health effects are magnified for persons with chronic health conditions. For example, in persons with diabetes, more sedentary time was associated with larger waste sizes, increased insulin, higher LDL ("bad cholesterol") and higher blood sugar in a study of more than 500 persons newly diagnosed with type 2 diabetes.¹⁴ The study, done over a one-year period, found that decreased activity predicts worsening metabolic variables in patients with diabetes.¹⁵ Similarly, for persons with osteoarthritis, inactivity leads to muscle weakness and to worsened pain and decreased mobility.¹⁶

¹⁰ ADC P000632-33.

¹¹ ADC P000819-23.

¹² Berg HE, Eiken O, Miklavcic, L, Mekjavic, IB. Hip, Thigh and calf muscle atrophy and bone loss after 5-week bedrest inactivity. *Eur J Appl Physiol.* (2007) 99:283-289.

¹³ Ferrando AA, Stuart CA, Sheffield-Moore M, Wolfe RR. Inactivity amplifies the catabolic response of skeletal muscle to cortisol. *J Clin Endocrinol Metab* 84:3515-3521, 1999. See also Knight J, Nigam Y, Jones A. Effects of bedrest 1-cardiovascular, respiratory and hematological system. *Nursing Times*; 105:21, 16-20 (2009).

¹⁴ Cooper AR, Sebire S, Montgomery AA, et al. Sedentary time, breaks in sedentary time and metabolic variables in people with newly diagnosed type 2 diabetes. *Diabetologia* (2012) 55:589-599.

¹⁵ *Ibid.*

¹⁶ Steultjens MPM, Dekker J, Bijlsma JWW. Avoidance of activity and disability in patients with osteoarthritis of the knee-The mediating role of muscle strength. *Arthritis & Rheumatism* (2012). 46(7):1784-1788.

According to the United States Centers for Disease Control and Prevention, older adults need at least two hours and thirty minutes of moderate-intensity aerobic activity (i.e., brisk walking) every week, as well as muscle-strengthening activities on two or more days a week that work all major muscle groups (legs, hips, back, abdomen, chest, shoulders, and arms).¹⁷ Comprehensive exercise programs (incorporating walking, aerobics, strength training, etc.) are most effective for elderly persons with medical conditions. One study showed that 6 months of comprehensive exercise had several positive physical outcomes for elderly persons with chronic conditions, including: grip strength, flexibility, oxygen saturation, metabolic equivalent.¹⁸ In a study of older women, moving for five or more hours per day was associated with lower blood pressure; regular movement throughout the day is important in managing hypertension in older women.¹⁹ Walking is particularly important to prevent or slow loss of function in the deconditioned or frail elderly.²⁰ It is reasonable to assume that persons who are confined to a small space nearly all of the time would benefit from even MORE physical activity, since the recommendations are for the general public who, at a minimum, generally experience a degree of baseline physical activity such as walking from room to room in their house.

Finally, according to the National Osteoporosis Foundation, persons over 50 and persons who are institutionalized are high-risk populations for vitamin D deficiency, which can lead to osteoporosis. These persons should therefore get at least 800-1000 IU of vitamin D daily.²¹ Spending time outside with access to direct sunlight can address this higher susceptibility to vitamin D deficiency.

A list of the documents that have been provided to me by plaintiffs' counsel since my last report is attached as Exhibit B. I reserve the right to supplement or modify my opinions if additional information or documents are provided in the future.

¹⁷ Centers for Disease Control and Prevention, "How Much Physical Activity Do Older Adults Need?", available at <http://www.cdc.gov/physicalactivity/everyone/guidelines/olderadults.html>.

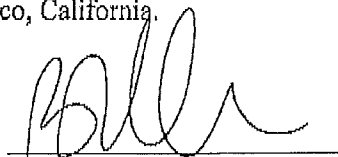
¹⁸ Hessert MJ, Gugliucci MR, Pierce HR. Functional fitness: maintaining or improving function for elders with chronic diseases. *Fam Med* 2005; 37(7): 472-476.

¹⁹ Brennan P, Pescatello LS, Bohannon, RW, et al. Time spent moving is related to systolic blood pressure in older women. *Prev Cardiol.* 2005; 8:160-164.

²⁰ See Graf C. Functional decline in hospitalized older adults-It's often a consequence of hospitalization, but it doesn't have to be. *AJN* 2006 106(1): 58-67.

²¹ National Osteoporosis Foundation, "Vitamin D and Bone Health," November 2010, available at <http://nof.org/files/nof/public/content/file/218/upload/68.pdf>.

Dated this 30th day of January, 2014, at San Francisco, California.

A handwritten signature in cursive script, appearing to read 'Brie Williams', written over a horizontal line.

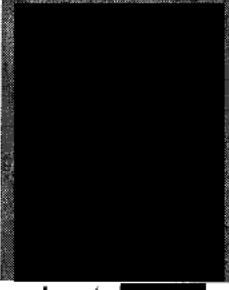
BRIE WILLIAMS, M.D., M.S.

A vertical line extending downwards from the signature line, ending in a small arrowhead pointing towards the bottom of the page.

Exhibit A

RETURN TO SEARCH RESULTS

RETURN TO DATASEARCH FORM

 Inmate [REDACTED]	Last Name		First Name		Middle Initial		Birth Date	
	[REDACTED]		[REDACTED]		[REDACTED]		[REDACTED]	
	Gender		Height (Inches)		Weight		Hair Color	
	FEMALE		61		108		BROWN	
	Eye Color		Ethnic Origin		Custody Class		Inmate / Detainee	
	BLUE		CAUCASIAN		5/5		INMATE	
	Sentence (yy/mm/dd)		Admission		Prison Release Date		Max End Date	
	018/00/00		04/13/1990				07/19/2024	
	Cur. Absconded		Hist. Absconded		Release Type		Most Recent Loc.	
	--		--		RECEIVED AT		ASPC Perryville	
Community Supervision/ Parole		Last Movement		Commitment Status		Status		
N		01/06/2010		COMPLETE AND VERIFIED		ACTIVE		

Earned Credit Release Date is provided for guidance. Confirmation can be sought by contacting ADC.

Details of inmate offenses can be accessed by reviewing the case file at the Office of the Clerk of the Court where the case was adjudicated.

- If you are the victim of a crime please visit [\[Victim Services\]](#).
- For family and friends inmate issues, please visit [\[Inmate Services\]](#).
- For public records or reports, please visit [\[Public Access\]](#) or contact the Public Access Office via [\[email\]](#).

Commitment Information 2 record(s)

Commit#	Sentence	Sentence County	Court Cause#	Offense Date	Sentence Status	Crime	Crime Info	Felony Class	Ruling	Verified
A01	0180000	MARICOPA	8905293	05/08/1989	PAR. CS	KIDNAPPING; DANGER/ REPETIT/ ENHANCE;	D/NR	CL2	N	YES
A02	0180000	MARICOPA	8905293	05/09/1989	IMPOSED	ARMED ROBBERY; DANGER/ REPETIT/ ENHANCE;	D/NR	CL2	Y	YES

Sentence Information 2 record(s)

Commit#	Sentence yy/mm/dd	Admit Date	Consec/ Concur	Release Date(s)	Supervision End	Sentence Expiration	Flat Maximum
A01	018/00/00	04/13/1990		Parole:02/10/2003		10/12/2006	05/21/2007
A02	018/00/00	04/13/1990	Consecutive:A01	Parole:01/05/2021 Temporary:01/14/2021		10/11/2021	07/19/2024

Profile Classification 38 record(s) [\[info\]](#)

Complete Date	Class. Type	Cust. Risk	Inst. Risk	Edu.	CTE	SA TX
04/13/2010	RECEIVED AT	E	E	0	0	0

RETURN TO SEARCH RESULTS

RETURN TO DATASEARCH FORM

Last Name		First Name		Middle Initial	Birth Date
[REDACTED]		[REDACTED]		[REDACTED]	[REDACTED]
Gender		Height (Inches)		Weight	Hair Color
FEMALE		64		120	BROWN
Eye Color	Ethnic Origin		Custody Class	Inmate / Detainee	
BROWN	CAUCASIAN		5/2	INMATE	
Sentence (yyymmdd)		Admission		Prison Release Date	Max End Date
DEATH		12/23/2004			DEATH
Cur. Absconded	Hist. Absconded	Release Type		Most Recent Loc.	Unit
-	-	RECEIVED AT		ASPC Perryville	
Community Supervision/ Parole		Last Movement		Commitment Status	Status
N		12/17/2010		COMPLETE AND VERIFIED	ACTIVE

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Commitment Information 1 record(s)

Commit#	Sentence	Sentence County	Court Cause#	Offense Date	Sentence Status	Crime	Crime Info	Felony Class	Rating	Verified
A01	DEATH	MARICOPA	2000-096032	10/08/2000	IMPOSED	MURDER 1ST DEGREE; DANGER/ REPETIT/ ENHANCE;	D/NR	CL1	Y	YES

Sentence Information 1 record(s)


Commit#	Sentence yyymmdd	Admit Date	Consec/ Concur	Release Date(s)	Supervision End	Sentence Expiration	Flat Maximum
A01	DEATH	12/22/2004					DEATH

Profile Classification 11 record(s) [\[info\]](#)

Complete Date	Class. Type	Cust. Risk	Inst. Risk	Edu.	CTE	SA TX
01/10/2013	RECLASSIFICATION	5	2	1	0	0
12/16/2011	RECLASSIFICATION	5	2	3	0	0
12/10/2010	RECLASSIFICATION	5	2	3	0	0
11/30/2009	RECLASSIFICATION	5	2	3	0	0
11/20/2008	RECLASSIFICATION	5	2	3	0	0

RETURN TO SEARCH RESULTS

RETURN TO DATASEARCH FORM

	Last Name		First Name		Middle Initial	Birth Date
	MALE		70		245	GRAY
	BLUE		BLACK		4/3	INMATE
	005/00/00		05/27/2011		LIFE	
	Cur. Absconded		Hist. Absconded		Release Type	
	--		--		RECEIVED AT	
	Community Supervision/ Parole Last Movement		Commitment Status		Status	
	N		07/28/2011		COMPLETE AND VERIFIED	

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Commitment Information 2 record(s)

Commit#	Sentence	Sentence County	Court Cause#	Offense Date	Sentence Status	Crime	Crime Info	Felony Class	Ruling	Verified
C01	LIFE	MARICOPA	2010054220	09/07/2009	IMPOSED	MURDER 1ST DEGREE; CONSPIRACY; DOMESTIC VIOLENCE	ND/NR	CL1	N	YES
C02	0050000	MARICOPA	2010054220	09/07/2009	IMPOSED	KIDNAPPING; CONSPIRACY; DOMESTIC VIOLENCE	ND/NR	CL2	Y	YES

Sentence Information 2 record(s)

Commit#	Sentence yymmdd	Admit Date	Consec/ Concur	Release Date(s)	Supervision End	Sentence Expiration	Flat Maximum
C01	LIFE	05/25/2011					LIFE
C02	005/00/00	05/25/2011	Consecutive: C01				LIFE

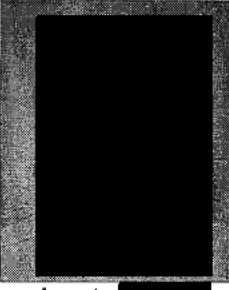
Profile Classification 4 record(s) [\[info\]](#)

Complete Date	Class. Type	Cust. Risk	Inst. Risk	Edu.	CTE.	SATX
06/14/2013	RECLASSIFICATION	4	3	1	0	0
01/15/2013		5	3	1	0	0
01/04/2012		5	1	3	0	0
07/08/2011	INITIAL CLASSIFICATION	5	1	3	0	0

Disciplinary Infractions 2 record(s) [\[info\]](#)

RETURN TO SEARCH RESULTS

RETURN TO DATASEARCH FORM

	Last Name		First Name		Middle Initial	Birth Date
	Gender	Height (inches)		Weight	Hair Color	
	MALE	72		185	GRAY	
	Eye Color	Ethnic Origin		Custody Class	Inmate / Detainee	
	BROWN	CAUCASIAN		5/5	INMATE	
	Sentence (yyymmdd)		Admission	Prison Release Date		Max End Date
	018/00/00		03/21/2005			11/23/2021
	Cur. Absconded	Hist. Absconded	Release Type	Most Recent Loc.	Unit	
	-N-	--	RECEIVED AT	ASPC Eyman	ASPC Eyman SMU	
Community Supervision/ Parole		Last Movement		Commitment Status		Status
N		08/14/2012		COMPLETE AND VERIFIED		ACTIVE

Earned Credit Release Date is provided for guidance. Confirmation can be sought by contacting ADC.

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Commitment Information 3 record(s)

Commit#	Sentence	Sentence County	Court Cause#	Offense Date	Sentence Status	Crime	Crime Info	Felony Class	Ruling	Verified
B01	0180000	NAVAJO	20040007	11/14/2003	IMPOSED	MANSLAUGHTER; DANGER/ REPETIT/ ENHANCE;	D/NR	CL2	Y	YES
C02	0020000	NAVAJO	20040040	01/07/2004	IMPOSED	DESTRUCTION OF PUBLIC JAIL;	ND/NR	CL5	N	YES
D01	0020000	NAVAJO	20050063	01/06/2005	IMPOSED	AGGRAVATED ASSAULT;	ND/NR	CL5	N	YES

Sentence Information 3 record(s)

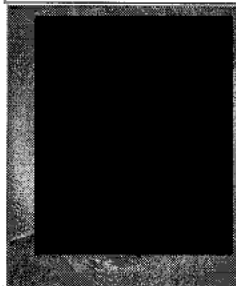
Commit#	Sentence yyymmdd	Admit Date	Consec/ Concur	Release Date(s)	Supervision End	Sentence Expiration	Flat Maximum
B01	018/00/00	03/15/2005		Supervised:09/13/2020	03/15/2023	09/13/2020	11/23/2021
C02	002/00/00	03/15/2005	Concurrent:B01				01/07/2006
D01	002/00/00	03/15/2005	Concurrent:C02				01/06/2007

Profile Classification 15 record(s) [\[info\]](#)

Complete Date	Class. Type	Cust. Risk	Inst. Risk	Edu.	CTE	SA TX
11/01/2013		5	5	0	0	0

RETURN TO SEARCH RESULTS

RETURN TO DATASEARCH FORM

	Last Name		First Name		Middle Initial	Birth Date
	Gender	Height (inches)		Weight	Hair Color	
	MALE	65		190	GRAY	
	Eye Color	Ethnic Origin	Custody Class		Inmate / Detainee	
	BLUE	CAUCASIAN	5/1		INMATE	
	Sentence (yyymmdd)		Admission	Prison Release Date		Max End Date
	LIFE		08/29/2012			LIFE
	Cur. Absconded	Hst. Absconded	Release Type	Most Recent Loc.		Unit
	--	--	RECEIVED AT	ASPC Eyman		
Community Supervision/ Parole		Last Movement	Commitment Status		Status	
N		08/29/2012	COMPLETE, BUT NOT VERIFIED		ACTIVE	

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Commitment Information 2 record(s)

Commit#	Sentence	Sentence County	Court Cause#	Offense Date	Sentence Status	Crime	Crime Info	Felony Class	Ruling	Verified
A01	LIFE	PIMA	20094604001	05/15/2003	IMPOSED	SEXUAL CONDUCT W MINOR;	D/NR	CL2	Y	NO
A03	0170000	PIMA	20094604001	05/15/2003	IMPOSED	MOLESTATION OF CHILD;	D/NR	CL2	N	NO

Sentence Information 2 record(s)

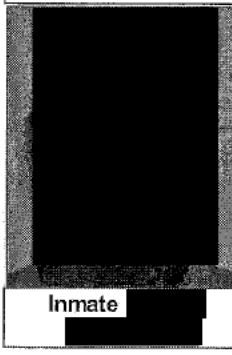
Commit#	Sentence yyymmdd	Admit Date	Consec/ Concur	Release Date(s)	Supervision End	Sentence Expiration	Flat Maximum
A01	LIFE	08/20/2012	Consecutive:A03				LIFE
A03	01700/00	08/20/2012				02/13/2027	07/18/2029

Profile Classification 2 record(s) [\[info\]](#)

Complete Date	Class. Type	Cust. Risk	Inst. Risk	Edu.	CYE	SA TX
04/04/2013		5	1	1	0	0
10/02/2012	INITIAL CLASSIFICATION	5	1	1	0	0

Disciplinary Infractions 0 record(s) [\[info\]](#)

[RETURN TO SEARCH RESULTS](#) [RETURN TO DATASEARCH FORM](#)

	Last Name		First Name		Middle Initial		Birth Date	
	Gender		Height (Inches)		Weight		Hair Color	
	MALE		75		175		BLACK	
	Eye Color		Ethnic Origin		Custody Class		Inmate / Detainee	
	BROWN		BLACK		5/4		INMATE	
	Sentence (yyymmdd)		Admission		Prison Release Date		Max End Date	
	035/00/00		05/09/1995				05/08/2030	
	Cur. Absconded		Hist. Absconded		Release Type		Most Recent Loc.	
	--		--		RECEIVED AT		ASPC Eyman	
Community Supervision/ Parole		Last Movement		Commitment Status		Status		
N		08/30/2012		COMPLETE AND VERIFIED		ACTIVE		

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Commitment Information 1 record(s)

Commit#	Sentence	Sentence County	Court Cause#	Offense Date	Sentence Status	Crime	Crime Info	Felony Class	Ruling	Verified
A01	0350000	MARICOPA	0113888	07/18/1980	IMPOSED	ARMED ROBBERY; DANGER/ REPETIT/ ENHANCE;	D/R-2	CL2	Y	YES

Sentence Information 1 record(s)

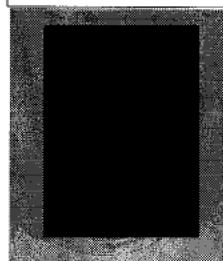
Commit#	Sentence yyymmdd	Admit Date	Consec/ Concur	Release Date(s)	Supervision End	Sentence Expiration	Flat Maximum
A01	035/00/00	03/06/1996		Parole:08/19/2028 Temporary:06/11/2024		03/09/2025	05/08/2030

Profile Classification 46 record(s) [\[info\]](#)

Complete Date	Class, Type	Cust. Risk	Inst. Risk	Edu.	CTE	SA TX
07/15/2013		5	4	1	0	0
05/29/2012		5	4	3	0	0
06/03/2011		5	5	3	0	0
04/20/2011		5	5	3	0	0

RETURN TO SEARCH RESULTS

RETURN TO DATASEARCH FORM



Inmate

Last Name	First Name	Middle Initial	Birth Date
Gender	Height (inches)	Weight	Hair Color
FEMALE	60	252	BLACK
Eye Color	Ethnic Origin	Custody Class	Inmate / Detainee
BROWN	NATIVE INDIAN	5/4	INMATE
Sentence (yyymmdd)	Admission	Prison Release Date	Max End Date
013/00/00	05/31/2006		11/23/2018
Cur. Absconded Hist. Absconded	Release Type	Most Recent Loc.	Unit
--	RECEIVED AT	ASPC Perryville	ASPC Perryville Spec Mgmt
Community Supervision/ Parole	Last Movement	Commitment Status	Status
N	10/04/2012	COMPLETE AND VERIFIED	ACTIVE

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Commitment Information 3 record(s)

Commit#	Sentence	Sentence County	Court Cause#	Offense Date	Sentence Status	Crime	Crime Info	Felony Class	Ruling	Verified
C01	0100600	MARICOPA	20051326920	10/07/2005	IMPOSED	ARMED ROBBERY; DANGER/ REPETIT/ ENHANCE;	ND/NR	CL2	N	YES
C04	0100000	MARICOPA	20051326920	10/07/2005	IMPOSED	KIDNAPPING;	ND/NR	CL2	N	YES
D01	0130000	MARICOPA	20060304600	07/17/2006	IMPOSED	ARMED ROBBERY; DANGER/ REPETIT/ ENHANCE;	D/NR	CL2	Y	YES

Sentence Information 3 record(s)

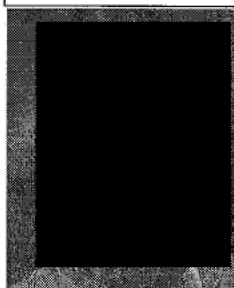
Commit#	Sentence yyymmdd	Admit Date	Conse/ Concur	Release Date(s)	Supervision End	Sentence Expiration	Flat Maximum
C01	010/06/00	05/19/2006				11/19/2014	04/06/2016
C04	010/00/00	05/19/2006	Concurrent:C01			03/16/2014	10/07/2015
D01	013/00/00	05/19/2006	Concurrent:C01	Supervised:10/24/2016	11/23/2018	01/22/2017	10/06/2018

Profile Classification 14 record(s) [\[info\]](#)

Complete Date	Class. Type	Cust. Risk	Inst. Risk	Edu.	CTE.	SATX
08/01/2013		5	4	2	4	0
04/17/2013		5	5	2	4	0
10/04/2012	RECLASSIFICATION	5	5	2	4	0
03/16/2012	RECLASSIFICATION	3	3	3	4	0
11/02/2011	RECLASSIFICATION	2	3	3	4	3
09/02/2010		3	2	2	3	2
08/18/2009		3	3	2	0	2

RETURN TO SEARCH RESULTS

RETURN TO DATASEARCH FORM

	Last Name		First Name		Middle Initial		Birth Date	
	Gender		Height (Inches)		Weight		Hair Color	
	MALE		70		229		BLOND	
	Eye Color		Ethnic Origin		Custody Class		Inmate / Detainee	
	BROWN		CAUCASIAN		4/4		INMATE	
	Sentence (yyymmdd)		Admission		Prison Release Date		Max End Date	
	016/00/00		06/01/2005				02/03/2020	
	Cur. Absconded		Hist. Absconded		Release Type		Most Recent Loc.	
	--		--		RECEIVED AT		ASPC - FLORENCE	
Community Supervision/ Parole		Last Movement		Commitment Status		Status		
N		12/06/2012		COMPLETE AND VERIFIED		ACTIVE		

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Commitment Information 1 record(s)

Commit#	Sentence	Sentence County	Court Cause#	Offense Date	Sentence Status	Crime	Crime Info	Felony Class	Ruling	Verified
C01	0160000	MARICOPA	20040077560	02/06/2004	IMPOSED	MURDER 2ND DEGREE; MURDER SECOND DEGREE; DANGER/ REPETIT/ ENHANCE	D/NR	CL1	Y	YES

Sentence Information 1 record(s)


Commit#	Sentence yyymmdd	Admit Date	Consec/ Concur	Release Date(s)	Supervision End	Sentence Expiration	Flat Maximum
C01	016/00/00	05/25/2005		Supervised:02/03/2020	05/05/2022		02/03/2020

Profile Classification 12 record(s) [\[info\]](#)

Complete Date	Class. Type	Cust. Risk	Inst. Risk	Edu.	CTE	SA TX
08/30/2013	RECLASSIFICATION	4	4	0	1	0
06/14/2012		5	5	0	1	0
12/02/2011	RECLASSIFICATION	5	5	0	1	0
09/30/2011	RECLASSIFICATION	4	4	0	1	0
09/23/2011		3	4	0	1	0

RETURN TO SEARCH RESULTS

RETURN TO DATASEARCH FORM

	Last Name		First Name		Middle Initial		Birth Date	
	Gender		Height (inches)		Weight		Hair Color	
	MALE		70		205		BROWN	
	Eye Color		Ethnic Origin		Custody Class		Inmate / Detainee	
	BROWN		CAUCASIAN		4/4		INMATE	
	Sentence (yyymmdd)		Admission		Prison Release Date		Max End Date	
	025/00/00		05/04/2010				02/17/2034	
	Cur. Absconded/Hist. Absconded		Release Type		Most Recent Loc.		Unit	
	--		RET.FM.COURT		ASPC Florence		ASPC Florence Central Unit	
Community Supervision/ Parole		Last Movement		Commitment Status		Status		
N		03/28/2013		COMPLETE AND VERIFIED		ACTIVE		

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Commitment Information 1 record(s)

Commit#	Sentence	Sentence County	Court Cause#	Offense Date	Sentence Status	Crime	Crime Info	Felony Class	Ruling	Verified
A01	0250000	MARICOPA	20091135260	02/23/2009	IMPOSED	MURDER 2ND DEGREE; DANGEROUS;	D/NR	CL1	Y	YES


Sentence Information 1 record(s)

Commit#	Sentence yyymmdd	Admit Date	Consec/ Concur	Release Date(s)	Supervision End	Sentence Expiration	Flat Maximum
A01	025/00/00	04/30/2010		Supervised:02/17/2034	08/18/2037		02/17/2034

Profile Classification 6 record(s) [\[info\]](#)

Complete Date	Class. Type	Cust. Risk	Inst. Risk	Edu.	CTE	SA TX
11/25/2013	RECLASSIFICATION	4	4	1	1	0
10/11/2012		5	5	1	1	0
09/12/2011		5	5	1	1	0
03/09/2011	RECLASSIFICATION	5	4	1	1	0
12/15/2010	RECLASSIFICATION	4	4	1	1	0
05/20/2010	INITIAL CLASSIFICATION	4	2	1	0	1

RETURN TO SEARCH RESULTS RETURN TO DATASEARCH FORM

	Last Name		First Name		Middle Initial		Birth Date	
	[REDACTED]		[REDACTED]		[REDACTED]		[REDACTED]	
	Gender		Height (Inches)		Weight		Hair Color	
	MALE		66		180		BROWN	
	Eye Color		Ethnic Origin		Custody Class		Inmate / Detainee	
	BROWN		MEXICAN AMERICAN		5/3		INMATE	
	Sentence (yyymmdd)		Admission		Prison Release Date		Max End Date	
	LIFE		02/24/1977				LIFE	
	Cur. Absconded/Hist. Absconded		Release Type		Most Recent Loc.		Unit	
	-		PAR. REVKD-REG.		ASPC Eyman		ASPC Eyman SMU	
Community Supervision/ Parole		Last Movement		Commitment Status		Status		
N		05/06/2013		COMPLETE AND VERIFIED		ACTIVE		

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Commitment Information 3 record(s)

Commit#	Sentence	Sentence County	Court Cause#	Offense Date	Sentence Status	Crime	Crime Info	Felony Class	Ruling	Verified
A01	LIFE	PIMA	0030683	10/09/1974	IMPOSED	MURDER;	N/A	OLD CODE	Y	YES
A02	0100000	PIMA	0030683	10/09/1974	IMPOSED	ARMED ROBBERY;	N/A	OLD CODE	N	YES
A03	0100000	PIMA	0030683	10/09/1974	IMPOSED	BURGLARY;	N/A	OLD CODE	N	YES

Sentence Information 3 record(s)

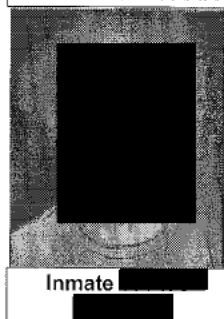
Commit#	Sentence yyymmdd	Admit Date	Consec/ Concur	Release Date(s)	Supervision End	Sentence Expiration	Flat Maximum
A01	LIFE	02/24/1977		Parole:01/18/2001			LIFE
A02	010/00/00	02/24/1977	Concurrent:A01	Parole:05/20/1979		01/18/1985	01/18/1986
A03	010/00/00	02/24/1977	Concurrent:A02	Parole:05/20/1979		01/18/1985	01/18/1986

Profile Classification 43 record(s) [\[info\]](#)

Complete Date	Class, Type	Cust. Risk	Inst. Risk	Edu.	GTE	SA TX
09/25/2013	RECLASSIFICATION	5	3	0	1	0
03/05/2013	RECLASSIFICATION	5	3	0	1	0
03/27/2012	RECLASSIFICATION	5	3	0	1	0

RETURN TO SEARCH RESULTS

RETURN TO DATASEARCH FORM



Last Name		First Name		Middle Initial	Birth Date
[REDACTED]		[REDACTED]		[REDACTED]	[REDACTED]
Gender	Height (Inches)		Weight	Hair Color	
MALE	69		170	BLOND	
Eye Color	Ethnic Origin		Custody Class	Inmate / Detainee	
BLUE	CAUCASIAN		5/5	INMATE	
Sentence (yyymmdd)		Admission		Prison Release Date	Max End Date
LIFE		09/18/1985			LIFE
Cur. Absconded Hist.	Absconded	Release Type	Most Recent Loc.		Unit
--	--	RET ESCRT LEAV	ASPC Eyman		ASPC Eyman SMU
Community Supervision/ Parole		Last Movement		Commitment Status	Status
N		06/22/2013		COMPLETE AND VERIFIED	ACTIVE

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Commitment Information 8 record(s)

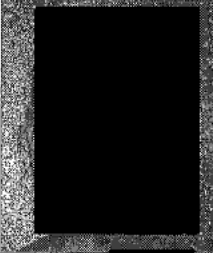
Commit#	Sentence	Sentence County	Court Cause#	Offense Date	Sentence Status	Crime	Crime Info	Felony Class	Ruling	Verified
A01	0080000	MARICOPA	0145712	01/13/1985	SENT.MOD	THEFT; DANGER/ REPETIT/ ENHANCE;	ND/R2	CL4	N	YES
A02	0040000	MARICOPA	0145712	01/13/1985	SENT.MOD	BURGLARY 3RD DEGREE; DANGER/ REPETIT/ ENHANCE;	ND/R2	CL5	N	YES
B01	0010600	COCONINO	0010749	01/24/1984	IMPOSED	BURGLARY 3RD DEGREE;	ND/NR	CL6	N	YES
C01	LIFE	COCONINO	0011929	01/11/1985	IMPOSED	BURGLARY 1ST DEGREE; DANGER/ REPETIT/ ENHANCE;	D/R-2	CL2	N	YES
C02	LIFE	COCONINO	0011929	01/11/1985	IMPOSED	AGGRAVATED ASSAULT; DANGER/ REPETIT/ ENHANCE;	D/R-2	CL3	Y	YES
C03	0040600	COCONINO	0011929	01/11/1985	IMPOSED	MISCNDCT INVOLVING WEAPONS; DANGER/ REPETIT/ ENHANCE;	ND/R2	CL6	N	YES
C04	0120000	COCONINO	0011929	01/11/1985	IMPOSED	CRIMINAL DAMAGE; DANGER/ REPETIT/ ENHANCE;	ND/R2	CL4	N	YES
C05	LIFE	COCONINO	0011929	01/11/1985	IMPOSED	THEFT; DANGER/ REPETIT/ ENHANCE;	D/R-2	CL3	N	YES

Sentence Information 8 record(s)

Commit#	Sentence yyymmdd	Admit Date	Consec/ Concur	Release Date(s)	Supervision End	Sentence Expiration	Flat Maximum
A01	008/00/00	08/05/1985		Parole:07/07/1991		11/02/1992	01/11/1993
A02	004/00/00	08/05/1985	Concurrent:A01	Parole:09/12/1987			01/11/1999
B01	001/06/00	09/09/1985	Concurrent:A01	Parole:08/30/1988			05/30/1986
C01	LIFE	01/04/1993	Consecutive:A01	Parole:10/16/2017			LIFE
C02	LIFE	01/04/1993	Consecutive:A01	Parole:10/16/2017			LIFE
C03	004/06/00	01/04/1993	Consecutive:A01	Parole:11/02/1995		02/13/1996	10/17/1996
C04	012/00/00	01/04/1993	Consecutive:A01	Parole:11/01/2000		09/29/2001	04/16/2004
C05	LIFE	01/04/1993	Consecutive:A01	Parole:10/16/2017			LIFE

RETURN TO SEARCH RESULTS

RETURN TO DATASEARCH FORM

	Last Name		First Name		Middle Initial	Birth Date
	MALE		68		220	GRAY
	BROWN		CAUCASIAN		4/4	INMATE
	LIFE		04/08/1994		LIFE	
	Cur. Absconded		Hist. Absconded		Release Type	Most Recent Loc. Unit
	--		--		RET ESCRT LEAV	ASPC Eyman
	Community Supervision/ Parole		Last Movement		Commitment Status	Status
	N		07/08/2013		COMPLETE AND VERIFIED	ACTIVE

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Commitment Information *3 record(s)*

Commit#	Sentence	Sentence County	Court Cause#	Offense Date	Sentence Status	Crime	Crime Info	Felony Class	Ruling	Verified
A01	0020000	PIMA	0041185	06/01/1992	IMPOSED	PUBLIC SEXUAL INDECENCY;	ND/NR	CL5	N	YES
A02	0300000	PIMA	0041185	06/01/1992	IMPOSED	SEXUAL CONDUCT W MINOR; DANG. CRIMES AG. CHILDREN; DANGER/REPETIT/ ENHANCE	ND/R1	CL2	N	YES
A03	LIFE	PIMA	0041185	06/01/1992	IMPOSED	SEXUAL CONDUCT W MINOR; DANG. CRIMES AG. CHILDREN; DANGER/REPETIT/ ENHANCE	ND/R2	CL2	Y	YES

Sentence Information *3 record(s)*

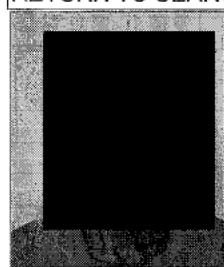
Commit#	Sentence yymmdd	Admit Date	Consec/ Concur	Release Date(s)	Supervision End	Sentence Expiration	Flat Maximum
A01	002/00/00	04/06/1994		Parole:03/26/1994			03/26/1995
A02	030/00/00	04/06/1994	Consecutive:A01				03/18/2025
A03	LIFE	04/06/1994	Consecutive:A02	Parole:03/17/2060			LIFE

Profile Classification *41 record(s)* [\[info\]](#)

Complete Date	Class. Type	Cust. Risk	Inst. Risk	Edu.	CTE.	SATX
06/19/2013	RECLASSIFICATION	4	4	0	0	0
12/11/2012	RECLASSIFICATION	5	4	0	0	0
08/20/2012	RECLASSIFICATION	5	4	0	0	0
07/08/2011		3	2	0	0	0

[RETURN TO SEARCH RESULTS](#)

[RETURN TO DATASEARCH FORM](#)



Inmate

Last Name	First Name	Middle Initial	Birth Date
Gender	Height (Inches)	Weight	Hair Color
MALE	66	135	GRAY
Eye Color	Ethnic Origin	Custody Class	Inmate / Detainee
BROWN	MEXICAN NATIONAL	5/4	INMATE
Sentence (yyymmdd)	Admission	Prison Release Date	Max End Date
018/00/00	09/14/2001		09/28/2019
Cur. Absconded Hist. Absconded	Release Type	Most Recent Loc.	Unit
--	RECEIVED AT	ASPC Florence	ASPC Florence Central Unit
Community Supervision/ Parole	Last Movement	Commitment Status	Status
N	07/18/2013	COMPLETE AND VERIFIED	ACTIVE

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Commitment Information 1 record(s)

Commit#	Sentence	Sentence County	Court Cause#	Offense Date	Sentence Status	Crime	Crime Info	Felony Class	Ruling	Verified
A01	0180000	SANTA CRUZ	CR-01-064	03/01/2001	IMPOSED	MANSLAUGHTER; DANGER/ REPETIT/ ENHANCE;	D/NR	CL2	Y	YES

Sentence Information 1 record(s)

Commit#	Sentence yyymmdd	Admit Date	Consec/ Concur	Release Date(s)	Supervision End	Sentence Expiration	Flat Maximum
A01	018/00/00	08/29/2001		Supervised:02/27/2017	09/28/2019	02/27/2017	08/29/2019

Profile Classification 20 record(s) [\[info\]](#)

Complete Date	Class. Type	Cust. Risk	Inst. Risk	Edu.	CTE.	SATX
05/17/2013	RECLASSIFICATION	5	4	0	0	0
01/27/2012	RECLASSIFICATION	2	3	0	0	0
01/06/2012		2	3	0	0	0
02/16/2011		3	3	0	0	0
02/09/2011		3	1	0	0	0
01/07/2010		3	3	0	0	0
01/02/2009		3	3	0	0	0
11/28/2007	RECLASSIFICATION	3	3	0	0	0
08/08/2006		3	3	3	4	1
02/09/2006		3	3	3	4	1
09/14/2005		3	1	4	4	1

Exhibit B

Documents sent from plaintiffs' counsel to plaintiffs' witness Dr. Brie Williams after her supplemental expert report was submitted on 12/9/13

ADC Staff Training Materials

- Suicide and Symptoms of Mental Illness
 - In-Service
 - ADC_S000317 2014 - Signs and Symptoms of Mentally Ill Inmates
 - ADC_S000318-000361 - 2014_Signs_and_Symptoms_of_Mentally_Ill_Inmates
 - Pre-Service
 - ADC_S000362-000384 - 9.7a COTA Signs & Symptoms of Mental Disorders
 - ADC_S000385-000439 - 9.7a COTA Signs and Symptoms of Mental Disorders
 - ADC_S000440-000444 - COTA Signs & Symptoms of Mental Disorder
- Suicide Prevention
 - In-Service
 - ADC_S000445 - 2014 Inmate Suicide Prevention
 - ADC_S000446-000515 - 2014_Inmate_Suicide_Prevention
 - Pre-Service
 - ADC_S000516-000517 - 9.7 SP Risk Factor Cards
 - ADC_S000518-000534 - 9.7b Suicide Prevention
 - ADC_S000535-000553 - 9.7b Suicide Prevention LP
 - ADC_S000554-000555 - SP Risk Factor Cards

Corizon Reports

- ADC_M00001 - CONFIDENTIAL SPDR Report
- ADC203028 - CONFIDENTIAL Arizona - Clinical Data Report October 2013
- ADC203029 - CONFIDENTIAL Arizona - Dental Utilization Statistics October 2013
- ADC203030 - CONFIDENTIAL Arizona - Dental Wait Times Report October 2013
- ADC203031 - CONFIDENTIAL Arizona - Formal Grievances by Category October 2013
- ADC203032 - CONFIDENTIAL AZ - Health Needs Requests (HNR) Appt Report October 2013 pivot table
- ADC203033 - CONFIDENTIAL Arizona - Hepatitis C Report October 2013
- ADC203034 - CONFIDENTIAL Arizona - Hospitalization Statistics Report October 2013
- ADC203035 - Arizona - Informal Grievances by Category October 2013
- ADC203036 - Arizona - Inmate Wait Times Report October 2013
- ADC203037 - CONFIDENTIAL Arizona - Intake Report October 2013
- ADC203038 - CONFIDENTIAL Arizona - Med Mal Stats October 2013
- ADC203039 - CONFIDENTIAL AZ - Medical Transports Complex Report October 2013
- ADC203040 - CONFIDENTIAL AZ - Medical Transports Statewide Report October 2013
- ADC203041 - CONFIDENTIAL Arizona - Monthly Staffing Report October 2013
- ADC203042 - CONFIDENTIAL Arizona Statewide Grievances October 2013
- ADC203043 - CONFIDENTIAL CAG FAQ PBMS Report FY14 - October 2013

- ADC203044-203050 - Corizon AZ Emergency Transports by Complex Oct 2013
- ADC203051-203060 - Corizon AZ Medication Report Oct 2013
- ADC203061-203062 - Corizon AZ Inpatient Admits Oct 2013
- ADC203297 - CAG FAQ PBMS Report FY13 - June 2013
- ADC203348 - November 2013 Inmate Wait Times Report
- ADC203349 - CONFIDENTIAL November 2013 Dental Utilization-Statistics
- ADC203350 - CONFIDENTIAL November 2013 Dental Wait Time Reporting
- ADC203351 - November 2013 Hepatitis C Report
- ADC203352 - November 2013 Inmate Intakes by Complex

Defendants' Expert Reports and Associated Productions

- Confidential Expert Report of John Dovgan
- Confidential Expert Report of Lawrence Mendel
- Confidential Expert Report of Joseph Penn
- Confidential Expert Report of Richard Seiter
- Defendants' Expert Materials, Volume 1, January 17, 2014
- Defendants' Expert Materials, Volume 2, January 17, 2014
- Defendants' Expert Materials, Volume 3, January 17, 2014
- Defendants' Expert Materials, Volume 4, January 17, 2014

Disclosure Statements

- Defendants' 11th Supplemental Disclosure Statement

Inmate Records from "Inmate Datasearch" webpage, 12/27/2013

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Interrogatories

- Defendant Charles Ryan's Responses to Plaintiff Robert Gamez's First Set of Interrogatories (Nos. 1-25)

Miscellaneous

- Expert Report of Dr. Brie Williams
- ADC203027 - Arizona - Cert and Licensing Monthly Update October 2013
- ADC203063-203258 - Wells 2d Supp Resp - Rog 7
- ADC203259-203296 - Wells 2d Supp Resp - Rog 8
- ADC203353-203359 - Feraci Store Order History
- ADC_P000984 - ADC ID Badge re Suicide Warning Signs
- ADC_S000556 - MHclassificationbyGenderDec9

Named Plaintiffs' Records

- ADC203298-203347 - Licci Updated Medical Records
- ADC071794-919 - Swartz Medical Records, 2012-03 to 2013-02
- ADC122465-565 - Swartz Medical Records, 2013-03 to 2013-07
- ADC_M000195-000206 - Joshua Polson's ENT Records
- ADC_P000580-000858 - AIMS REPORTS - ALL NAMED PLAINTIFFS (CONFIDENTIAL)

NCCHS Accreditation Reports

- ADC_P000888-000901 - Douglas 20130628 Report
- ADC_P000902-000915 - Perryville 20130628 Report.
- ADC_P000916-000919 - Perryville 20131011 Update Report
- ADC_P000920-000933 - Phoenix 20130613 Report
- ADC_P000934-000950 - Tucson 20130628 Report
- ADC_P000951-000959 - Tucson 20131108 Update Report
- ADC_P000960-000964 - Winslow 20131119 Update Report
- ADC_P000965-000973 - Yuma NCCHC - 2011-03-11 - update report
- ADC_P000974-000976 - Douglas 20131119 Update report
- ADC_P000977-000979 - Perryville 20131118 Update report
- ADC_P000980-000983 - Phoenix 20131122 Update report

Photos

- ADC165980-166048 - Florence - 2013-08-20 (redacted)
- ADC166049-166110 - Lewis - 2013-08-21 (redacted)
- ADC166111-166173 - Perryville - 2013-08-19 (redacted)
- ADC166174-166183 - Perryville-Lumley - 2013-08-19 (redacted)
- ADC166184-166215 - Tucson - 2013-08-22 (redacted)

Programs

- ADC_P000859-000865 - Tucson HU-7 WIPP Time sheets
- ADC_P000866 - Eyman Special Mgmt Unit I Map as of 10-28-13
- ADC_P000867 - Eyman Mental Health Program Schedule
- ADC_P000882 - Eyman Weekend Recreation Schedule
- ADC_P000883-000886 - Phoenix-Baker - Introduction to Baker MH Program
- ADC_S000286-000291 - Central Unit Mental Health Programs & Schedule

Resumes

- ADC203360-203362 - Mark Jansen CV
- ADC203363-203364 - Mark Fleming CV
- ADC203365-203367 - Thomas Buenker CV
- ADC203368-203371 - William Smallwood CV