

United States District Court
CENTRAL DISTRICT OF ILLINOIS

Curtis W. Wilson

Plaintiff

vs.

Case No. 16-2080 MMM

(The case number will be assigned by the clerk)

JEFF Woods (Sheriff)
John Ramsey (Jail Admin)
Richard Wilson (City)
Chief Deputy Metcalf (Cor)
David Neal (Deputy)
Cody (Deputy)
William Motley (Police Sheriff)

Defendant(s)

(List the full name of ALL plaintiffs and defendants in the caption above. If you need more room, attach a separate caption page in the above format).

COMPLAINT

Indicate below the federal legal basis for your complaint, if known. This form is designed primarily for pro se prisoners challenging the constitutionality of their conditions of confinement, claims which are often brought under 42 U.S.C. § 1983 (against state, county, or municipal defendants) or in a "Bivens" action (against federal defendants). However, 42 U.S.C. § 1983 and "Bivens" do not cover all prisoners' claims. Many prisoners' legal claims arise from other federal laws. Your particular claim may be based on different or additional sources of federal law. You may adapt this form to your claim or draft your own complaint.

- 42 U.S.C. §1983 (state, county or municipal defendants)
- Action under *Bivens v. Six Unknown Federal Narcotics Agents*, 403 U.S. 388 (1971)(federal defendants)
- Other federal law: _____

Unknown Conditions Resulting in injury-failure to Allow Property Bond.
Denial and/or Failure of mental health care

*Please refer to the instructions when filling out this complaint. Prisoners are not required to use this form or to answer all the questions on this form in order to file a complaint. This is not the form to file a habeas corpus petition.

I. FEDERAL JURISDICTION

Jurisdiction is based on 28 U.S.C. § 1331, a civil action arising under the United States Constitution or other federal law. (You may assert a different jurisdictional basis, if appropriate).

II. PARTIES

A. Plaintiff:

Full Name: Curtis Wayne Wilson

Prison Identification Number: B-08082

Current address: Po Box 999 Pinckneyville IL
62274

For additional plaintiffs, provide the information in the same format as above on a separate page. If there is more than one plaintiff, each plaintiff must sign the Complaint, and each plaintiff is responsible for paying his or her own complete, separate filing fee.

B. Defendants

Defendant #1:

Full Name: Jeff Woods

Current Job Title: Sheriff

Current Work Address 228 W Central Paris IL
61944

Defendant #2:

Full Name: John Ramsey

Current Job Title: Jail Administrator Edgar County Jail

Current Work Address 228 W Central Paris IL
61944

Defendant #3:

Full Name: Richard (Richy) Wilson

Current Job Title: Sergant City Police Dept
Current Work Address: Paris Police Dept Paris IL
61944

Defendant #4:

Full Name: Chief Deputy metcalf (Greg metcalf)
Current Job Title: Chief Deputy Edgar County Sheriff
Current Work Address: 228 N Centralst Paris IL
61944

Defendant #5:

Full Name: David Neal
Current Job Title: Deputy Edgar County Jail
Current Work Address: 228 N Central Paris IL
61944

For additional defendants, provide the information in the same format as above on a separate page.

III. LITIGATION HISTORY

The "three strikes rule" bars a prisoner from bringing a civil action or appeal *in forma pauperis* in federal court if that prisoner has "on 3 or more occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. § 1915(g).

A. Have you brought any other lawsuits in state or federal court dealing with the same facts involved in this case? Yes No

If yes, please describe _____

B. Have you brought any other lawsuits in federal court while incarcerated?

Yes No

Defendant #6

Full name: William Motley

Job title former Sheriff

Current work address

Defendant #7

Full name Cody

Job title Jailer Edgar County Jail

Work address 228 n central Paris IL 61944

C. If your answer to B is yes, how many? _____ Describe the lawsuit(s) below.

1. Name of Case, Court and Docket Number

2. Basic claim made

3. Disposition (That is, how did the case end? Was the case dismissed? Was it appealed? Is it still

pending?)

For additional cases, provide the above information in the same format on a separate page.

IV. EXHAUSTION OF ADMINISTRATIVE REMEDIES

Prisoners must exhaust available administrative remedies before filing an action in federal court about prison conditions. 42 U.S.C. § 1997e(a). You are not required to allege or prove exhaustion of administrative remedies in the complaint. However, your case must be dismissed if the defendants show that you have not exhausted your administrative remedies, or if lack of exhaustion is clear from the complaint and its attachments. You may attach copies of materials relating to exhaustion, such as grievances, appeals, and official responses. These materials are not required to file a complaint, but they may assist the court in understanding your claim.

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

B. Have you filed a grievance concerning the facts relating to this complaint?

Yes No

If your answer is no, explain why not

C. Is the grievance process completed? Yes No *no response From Admin*

V. STATEMENT OF CLAIM

Place(s) of the occurrence Edgar County Jail - Edgar County Courthouse

Date(s) of the occurrence 12-15-14 - 1-5-15 1-11-15 1-21-15 - 2-2-15
~~1-21-15 - 2-2-15~~
7-3-15 - 7-24-15

State here briefly the FACTS that support your case. Describe what each defendant did to violate your federal rights. You do not need to give any legal arguments or cite cases or statutes. Number each claim in a separate paragraph. Unrelated claims should be raised in a separate civil action.

THE COURT URGES YOU TO USE ONLY THE SPACE PROVIDED. Federal Rule of Civil Procedure 8(a) requires only a "short and plain statement" of your claim showing that you are entitled to relief. It is best to include only the basic, relevant facts, including dates, places, and names.

On 12-15-14 I was booked into Edgar County Jail and placed into the "Bird Cage" upper most cell block in said cell block mold appears to grow in and around shower area Drains and sinks fail to work throughout cell block. For the first ~~all~~ days I was locked into a cell with out Potable water and no flushable toilet, After bring this to Stacey Reed (Tailer) She informs Jail Staff and they then allow Cell doors to remain open at night, Temperatures at night Dip into frigid zones AND only get slightly better during the day, wires hang from ceiling Still carrying CURRENT *The Paris Beacon NEWS printed an Article deeming Jail uninhabitable On 1-22-15 as I stepped out of Shower I Slipped on Shower floor falling out of Shower onto floor Resulting in 3 Broken Ribs Documents and Reports along with an answered grievance are obtainable at Paris Community Hospital and Edgar County Jail. Shower is approx 18" off ground. On 2-2-15 I makes arrive at Edgar County Courthouse

* Mold on ceiling walls and shower area dripping down onto me during Shower. Since Paris Community Hospital

upon arrival several inmates are to go up stairs to Courtroom there for Pre-Liminary Hearings as we gather in front of elevator as we would normally do Officer Sgt Richy Wilson orders inmates up stairs Deputy Cody? Looks baffled as Sgt Richy Wilson again States Lets go get moving as we start to go up the stairs in a Rush Due to Officers Sgt Richy Wilson Tone of voice about 4 steps up the Shackle chain catches my left foot and trips me head first into the stairs, Deputy Cody tries to catch me and does prevent my face from hitting first, elbow, arm, shoulder and neck ~~no~~ substance injury as a result visit to clinic the next day I was released resulted in pain killers and MRE scheduled for neck, neck pain and Ahlner nerve damage still persist.

during my arrest and time at jail 07-03-15 - 7-24-15 I on several attempts tried to post property as bond, Sheriff Jeff Woods spoke to by his own admission States Attorney Mark Isaaf to gain legal advise on how to do so, After speaking to SA ISAAC Sheriff stated my property needed to be worth \$80,000 to cover \$40,000 bond when bail was only \$4,000 and Double bail

Set in the bond would be \$8,200 property value is \$19,400 uncumbered. After showing the Statue to Sheriff Woods he agreed yet said he didnt want to go against S.A. Mark ISAF, which Denies my ~~Due~~ Due Process to Bail. Conditions in that cell Block "Bull Pen" upper cell Block also where deplorable, Only one sink had cold water out of 6 mold all over ceiling walls in Shower area Shower also had no slip guard grip nor did the floor in upper most cell block. Conditions throughout living areas at Jail have been documented and inmates was to be moved to surrounding Counties but as of 11-25-15 full use of Jail was under way. Before leaving Jail I asked Sheriff to settle this and all matters he said He could not just write me a check for a couple thousand dollars. John Ramsey was witness to this statement.

ON 11-13-15 I was booked into the Edgar county Jail on the 15th or 16th I asked for mental Health Care a week later mental health arrived only on Routine not because, Admm at Jail Requested it I was transferred to prison before they could help. IDOC has diagnosed me w/PTSD and Depression. Fungal Infection was also after stay at Jail around Public Area. Since been cleared.

RELIEF REQUESTED

(State what relief you want from the court.)

A letter of apology from Sheriff Jeff Woods
Doctor Bills paid at Paris Community Hospital
Jail to be closed after federal inspection
and monetary payment of \$27,000 and
all legal fees that may incur amount
is based on one year of past salary
or an amount set out by court that
is suitable for the conditions of this
suit as a result of conditions of Edgar
County Jail

JURY DEMAND

Yes

No

Signed this 23rd day of March, 2016

(Signature of Plaintiff)

Name of Plaintiff: Curtis Wayne Wilson	Inmate Identification Number: B08082
Address: po Box 999 Pinckneyville IL 62274	Telephone Number:

150882

Book 999

Embrey v. ... 62274

Jeff. D.
Mason

United States District Court

Alabama Division

201 S Vine St Room 218

Albama

61802

RECEIVED
U.S. DISTRICT COURT
MARCH 29 2016