

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

HADIX, EVERETT,  
MAPES, RICHARD,  
SOMMERVILLE, PATRICK C.,  
HUDSON, ROOSEVELT JR.,  
KOSTER, BRENT E.,  
MCDONALD, LEE A.,  
STURGES, DARRYL,  
FLEMSTER, ROBERT,  
LOVETT, WILLIAM,  
COVINGTON, JAMES,  
THOMAS, FRANK,  
INMATES OF SOUTHERN  
MICHIGAN PRISON AND ALL  
OTHER SIMILARLY CONFINED,

Plaintiffs, /

vs

THE HONORABLE WILLIAM G. MILLIKEN,  
individually and in his capacity as  
Governor of the State of Michigan,  
PERRY M. JOHNSON, individually and in  
his capacity as Director of the  
Michigan Department of Corrections,  
BARRY MINIZES, individually and in his  
capacity as Warden, Southern Michigan  
Prison, at Jackson, Michigan  
CHARLES ANDERSON, individually and in  
his capacity as Past-Warden of the  
State Prison of Southern Michigan,  
WILLIAM F. GRANT, individually and in  
his capacity as Deputy Warden of the  
State Prison of Southern Michigan,  
DANIEL TRUDELL, individually and in his  
capacity as Deputy Warden of the State  
Prison of Southern Michigan,  
DUANE SHOLES, individually and in his  
capacity as Deputy Warden of the State  
Prison of Southern Michigan,  
JOHN JABE, individually and in his c  
capacity Bussiness Manager of the State  
Prison of Southern Michigan,  
JAMES FOGATS, individually and in his  
Capacity as Adm. Assistant to the Warden  
of the State Prison of Southern Michigan,  
ROY RIDER, individually and in his capacity  
as Classification Director of the State  
Prison of Southern Michigan,  
CHARLES USTESS, individually and in his  
capacity as Resident Services Director  
of the State Prison of Southern Michigan,  
DON P. Le DUC, individually and in his  
capacity as Chairman of the Corrections  
Commission of the State of Michigan,  
THE MICHIGAN CORRECTIONS COMMISSION,  
individually and in their capacity as  
Commissioners of the Michigan Dept.  
of Corrections.

Defendants. /

ATTORNEY GENERAL  
CORRECTIONS DIVISION  
SEP 16 1980  
Assigned To \_\_\_\_\_  
DEPT. OF THE  
ATTORNEY GENERAL  
SEP 10 1980  
LITIGATION UNIT

CIVIL Action No: \_\_\_\_\_

COMPLAINT FOR DECLARATORY  
INJUNCTIVE & MONETARY

REGISTER

42 U.S.C. 1983

*Original  
Complaint  
8/12/80*

Hadix v. Johnson



PC-MI-003-001

I.  
PRELIMINARY STATEMENT

1. Plaintiffs, individually and on behalf of all other persons similarly situated, bring this action based upon the United States Constitution and 42 USC Sec. 1983, to seek redress for the deprivation under color of state law, of rights, privileges and immunities secured by the First, Fourth, Sixth, Eighth, Ninth, and Fourteenth Amendments to the United States Constitution. Plaintiffs seek declaratory and injunctive relief to bar the unconstitutional policies and practices of Defendants and damages for the injuries the named Plaintiffs suffered as a result of said policies and practices.

2. In this action Plaintiffs assert their Constitutionally guaranteed rights and freedoms not to be subjected to the existing inhumane conditions within the Southern Michigan Prison, at Jackson.

II.  
JURISDICTION

3. Jurisdiction is conferred on the Court by 28 USC Sec. 1343 (3) (4), which provide for original jurisdiction of this court in all suits authorized by 42 USC Sec. 1983 to redress the deprivation under color of state law, of any right, privilege, or immunity secured by the Constitution of the United States or by an Act of Congress providing for equal or civil rights of all persons within the jurisdiction of the United States.

4. Jurisdiction is also conferred on the Court by 28 USC Sec. 1331, which provides for original jurisdiction of this Court wherein the matter in controversy exceeds the sum or value of \$10,000, exclusive of interests and costs, and arises under Constitution, laws and treaties of the United States.

5. Plaintiffs' actions for declaratory and injunctive relief, and for damages, are authorized by:

- a. 28 USC Sec. 2201 & 2202, and Rule 57 of the Federal Rules of Civil Procedures, which relate to declaratory judgments;
- b. 42 USC Sec. 1983 which provides redress for the deprivation under color of law of rights, privileges and immunities secured to all citizens and persons within the jurisdiction of the United States by the Constitution of the United States.

6. This action is also brought directly under the First, Fourth, Fifth, Sixth, Eighth, Ninth, and Fourteenth Amendments to the Constitution of the United States.

7. This Court has jurisdiction to hear and decide all matters, and state claims raised in this suit under its power of pendent jurisdiction.

### III.

#### CLASS ACTION

8. Plaintiffs bring this action pursuant to Rule 23 (a), (b), (1), and (b) (2) of the Federal Rules of Civil Procedure, on behalf of a class of all persons similarly situated.

9. The class is composed and defined as consisting of all past, present, and future inmates of the State Prison of Southern Michigan, Jackson.

10. (a) The class is so numerous that joinder of all members is impractical; (b) There are questions of law and fact common to the class; (c) The claims of the representative parties are typical of the claims of the class, and (d) the representative parties will fairly and adequately protect the interests of the class.

11. The prosecution of separate actions by individual members of the class would create a risk of: (a) inconsistent or varying adjudications with respect to individual members of the class which would establish incompatible standards of conduct for the Defendants, and

(b) adjudications with respect to individual members of the class which would as a practical matter be dispositive on the interests of the other members not party to the adjudication or substantially impede their ability to protect their interests.

12. The Defendants and their agents have (a) acted on grounds generally applicable to the class and (b) refused to act on grounds generally applicable to the class.

13. Declaratory and injunctive relief with respect to the class as a whole is appropriate if any relief is appropriate.

#### NAMED PLAINTIFFS

14. All Named Plaintiffs are adult citizens of the United States of America and the State of Michigan.

15. All named Plaintiffs are now and have been, for all intents and purposes of the Complaint prisoners of the State of Michigan in the custody of the Michigan Department of Corrections incarcerated at the State Prison of Southern Michigan, Jackson, Michigan.

16. Plaintiff JOHN DOE is an adult citizen of the United States and State of Michigan who is currently incarcerated at the State Prison of Southern Michigan, Jackson, Michigan.

#### DEFENDANTS

17. All Defendants are adult citizens of the United States and the State of Michigan and are sued individually and in their capacities as officials of the State Prison of Southern Michigan and the State of Michigan. They are either responsible for the administration of the prison and the care and custody of the inmates or have power to alleviate conditions there but have not exercised that power.

18. Defendant WILLIAM G. MILLIKEN is the duly elected Governor of the State of Michigan and is ultimately responsible for Administration of the State Prison of Southern Michigan. ( Michigan Constitution Art. Sec )

19. Defendant PERRY M. JOHNSON, is Director of the Michigan Department of Corrections and is duly charged with the sound maintenance of all Regional Facilities within that Department.

20. Defendant BARRY MINTZES AND CHARLES E. ANDERSON, are or have been Regional Administrators for the Dept. of Corrections and duly charged with the care and custody of all inmates at the State Prison of Southern Michigan.

21. Defendants WILLIAM F. GRANT, DANIEL TRUDELL, DUANE SHOLES, are Deputy Wardens of the State Prison of Southern Michigan . They are duly charged with the care, security and sound maintenance of all inmates of the State Prison of Southern Michigan.

22. Defendants JAMES FOGATS and CHARLES UTESS, are duly charged with Resident Treatment Programs and implementing Administrative policy at the State Prison of Southern Michigan.

23. Defendant JOHN JABE is charged with appropriation of monies to the individual depts. within the State Prison of Southern Michigan.

24. Defendant ROY RIDER, and his successor is Director of Classification of the State Prison of Southern Michigan and is duly charged with the classification of inmates for security and treatment programs.

#### FACTUAL ALLEGATIONS

25. Plaintiff inmates and the class they represent while incarcerated at the State Prison of Southern Michigan have been, are and will continue to be subjected to the illegal, unconstitutional and dehumanizing conditions described in this Complaint.

26. The conditions described hereinafter exist pursuant to the willful and intentional acts, practices, policies and omissions of Defendants in this action.

27. The State Prison of Southern Michigan was built in the early 1900's.

28. The State Prison of Southern Michigan Central Complex, is designed and operated as a Maximum security placement unit.

29. The architecture of the Central Complex is maximum in the penological sense.

30. Most inmates of the State Prison of Southern Michigan are housed in "multiple dwelling" units. (see MSA 5.2855, MCLA 125.402)

31. Inmates are only provided with 55.3 sq. ft. of living space which according to modern Correctional Standards, is inadequate. (These standards have been set down by the American Correctional Association and according to Michigan Statutes, MCLA 125.483, 124.409, 125.410, 125.440)

32. Southern Michigan Prison is antiquated and shows scars left by years of neglect.

33. All cell blocks are infested with cockroaches.

34. Cell blocks 3,4,5,7,8 and 6 are plagued by flying and nesting birds.

35. Bird droppings and feces are prevalent in the above listed cell blocks.

36. Ventilation equipment is non-existent.

37. In the summer months, odors, excessive heat and humidity are unbearable.

38. Poor house keeping practices are prevalent throughout the prison.

39. Plumbing throughout the prison fails to meet health or building codes for Correctional institutions. (see MCLA 125.435, 125.409, 125.410)

40. Showers in most blocks are rusted and in need of new drains.

41. The ratio of showers to inmates is seriously below Modern Correctional Standards and Michigan Statutes. (One (1) shower per 60 sixty Men)

42. Shower tiles are of the recessed grout type and can not be properly cleaned.

43. Toilets (water closets) on the upper levels back up, when toilets on the same line are flushed causing feces and stagnant water to sit in the bowl. (this is in violation of MCLA 125.435, 125.409, 125.410 125.482, 125.495 & 496)

44. In the summer months showers are scalding hot, In winter months showers are iced cold.

▷ 45. Outside toilet facilities are backed up and are a breeding ground for bacteria and mold.

▷ (46) Resident traffic around the yard is always congested precluding observation from the guard towers.

▷ 47. Theft from cells has increased 500% in the last two years.

▷ 48. Security has the manpower to protect inmates and their property yet they can be seen standing around in groups "kicking it".

▷ (49) Because of the lack of security, thefts occur more frequently and then residents are forced to prove "staff negligence" in order to receive reimbursement for their lost property. This is a "Catch 22".

50. Rules set forth in DOC Policy Directives are not being enforced concerning the congregation of more than four (4) inmates.

▷ 51. More than one half ( $\frac{1}{2}$ ) of the inmate population does not have a working assignment.

▷ 52. Inmate job opportunities have decreased because of the removal of the laundry, textiles, and carpentry shops to the outside.

▷ (53) Because jobs are scarce, inmates are allowed to "run free" in the yard.

▷ 54. Security fails to issue tickets because of the unrealistic amount of paperwork required for each ticket.

▷ 55. Security is also precluded from issuing tickets because the investigators cannot handle the amount of tickets issued and have to "tear up" the tickets because they exceed the time limit for hearings.

▷ 56. Forty acres (40) of "prime" recreation land has been closed.

▷ (57) Fights, stabbings, and robberies occur on the average of one (1) per day.

▷ 58. The number of serious injury cases admitted to the infirmary or Foote East Hospital has increased twofold in the last year.

59. The number of "reported" suicides has increased drastically in the last year.

60. Known homosexuals are allowed to roam the yard increasing the chances of assaults and reprisals.

61. There has not been a major "shake-down" for weapons in the last six (6) months.

62. The number of residents who have "locked up" for fear of violence is approx. 200. This far exceeds the per-cent ratio for a normal prison.

63. Residents are not permitted to call witnesses for minor ticket violations.

64. Tickets are not followed through on because of the small number of "hearings investigators".

65. Cell blocks have only one (1) guard tower that must control and secure the blocks and the yard area.

66. Cell blocks 3,4,5, 7, & 8 have only one guard station which cannot adequately secure the top two (2) levels from theft and violence.

67. Lighting in the cell blocks is antiquated and poses a security problem.

68. Cell blocks are totally void of sound insulation and the din that is caused creates health problems.

69. No limits are placed on the amount of shouting and loud noises in cell blocks 3,4,5,6,7,8,

70. Psychologically ill patients have been released to the general population.

72. Resident Unit Mgrs. are unschooled for the services they are hired to provide.

73. Resident Unit Mgrs. employ inmate clerks who have access to inmate psychological files.

74. The mess hall is infested with mice and cockroaches.

75. The "yard area" is totally void of grass and is worn beyond repair.

76. Resident walkways are filled with "chuckhole" and are in need of repair.



78. Walkways flood during the summer and inmates must walk through puddles of standing water.

79. Walkways are not cleaned in the winter months and inmates must wade through drifts of snow.

80. The back dock area is constantly flooded and smells of decaying food and slime.

D 81. Toilets in the cell blocks are so low to the ground that they cause hemorrhoids and urine splatters on the walls and floor.

D 82. Inmates personal and legal mail is handled with little or no respect and comes to the inmate in cut up pieces.

Paris D 83. The diet that inmates receive is unhealthy and inadequate.

84. Inmates receive little fresh fruits and vegetables.

85. Although the Adm. details officers to the blocks, regular scheduled rounds are not enforced.

86. Inmates from other blocks are stealing from blocks that they do not belong in.

D 87. Emotionally unstable officers are being hired by the DOC.

D 88. Little inservice training is done by the Administration.

D 89. Administration turnover has contributed to an unstable environment and the high tension among staff and inmates.

D 90. The resident visiting room is inadequate for the inmate population.

91. Resident visitors are often forced to wait up to three (3) hours for their visits.

92. Security and staff are indifferent to visitors complaints.

93. The visiting room is void of fire safety features.

D 94. For all intents and purposes Plaintiffs are forced to serve a dual sentence. Being at the mercy of other inmates and serving the sentence imposed by the Courts.

95. The official system plays a vital role in regulating the types of inmate roles that emerge, the social functions they serve, and the relationship between them.

TREATMENT PROGRAMS:

96. The number of drug and alcohol programs is totally inadequate for the inmate population.

97. Because of the above, inmates are precluded from getting the necessary treatment and programming required to meet parole standards.

98. Parole "flops" are contingent on programs inmates cannot obtain.

D 99. Unlicensed counselors are treating inmates, for psychological pathologies.

100. Inmates in segregation, "blue hold" card, and 5-west are precluded from receiving educational programs.

101. There is a lack of adequate vocational training programs for the inmate populations.

LIBRARY SERVICES:

102. There is no civilian staff to assist inmates in preparation of legal documents.

103. Law books may not be checked out overnight.

104. The Prison Legal Services of Michigan are precluded, by contract, from assisting inmates with suits against the institution.

105. Although Prison Legal Services of Michigan is under contract to provide for legal services to the inmate populations, low funding and an inadequate staff preclude them from working on a meaningful basis.

106. Although the library (law) does contain a partial fulfillment of needs for inmates, it is still far from adequate in Federal reporters and out of state reports.

107. Photo copies of law material are outrageously priced which precludes inmates from a meaningful research aid:

FIRE SYSTEMS:

108. Smoke detectors are non-existent in most critical areas.

109. Smoke barriers are non-existent in the cell blocks.

110. Cell blocks or other critical areas are not divided into compartmentalized fire zones.

111. Fire drills are non-existent.

112. Fire extinguishers are non-existent in all critical areas.

113. The prison fails to meet life safety codes, building codes, or fire safety codes as set down by the major corrections standards.

114. Without the above, inmates are in danger and serious threat if a fire were to break out.

CLOTHING:

115. Inmates are only issued two (2) lightweight pairs of socks that must be worn throughout the year.

116. Only low-top shoes are issued to inmates.

117. No boots are issued to inmates.

118. Inmates are only issued one (1) lightweight jacket for year round wear.

119. No long underwear is issued.

120. No hats are issued.

121. Because inmates are forced to buy clothing only from the inmate store, they are precluded from buying competitively and must pay an inflated price for goods.

122. Poor inmates are discriminated against by DOC policy allowing only new clothing to be brought into the institution.

MEDICAL:

123. Prisoners are allowed to work in such sensitive areas as x-ray department, physical therapy department and the psychiatric services unit.

124. The use of inmates in these areas violates the American Medical Association's Standards, for Correctional Health Care Facilities.

125. Over the years, bureaucratic indifference has caused an ongoing conflict of interest between custody and medical staff.

126. The present dentist-inmate ratio is inadequate and precludes proper treatment for Plaintiffs.

127. There is a serious backlog of inmates awaiting dental treatment.

128. There are no beds for inmates requiring long-term psychiatric care.

129. Handicap inmates are forced to stand in long feeding, and pharmaceutical lines.

130. The Southern Michigan Prison Infirmary is forced to handle medical cases from five (5) adjoining farms, TRUSTY Division, and the Northside Complex, which it is totally understaffed to provide.

CLASIFICATION:

131. Inmate classification is based on one Ten (10) minute transcase interview which is totally inadequate to assess an inmates educational or security needs.

132. The classification system used results in an over classification both to and within the maximum security facility.

133. Despite a clear mandate from the Dept. of Corrections, stating that no prisoner will be classified to a more secure status than security, and program needs dictate at the present time, over 600 prisoners above the rated capacity have been classified to Southern Michigan Prison, Central Complex.

134. No indepth psychological evaluation is given when classification is being done.

135. Inmates are classified according to the sentence they received, precluding any meaningful placement.

RESULTS OF CONDITIONS CITED

136. Plaintiffs and the class they represent are subjected to long term degradation and demoralizing conditions. This traumatizing atmosphere is a gross violation of modern penological standards and the United States Constitution. These persons are subject to life-threatening environment and are punished twice for one crime. Any dignity that they had as human beings is taken from them by the experience of being incarcerated at the State Prison of Southern Michigan.

### FIRST CLAIM

137. As a first cause of action, Plaintiffs hereby and re-allege paragraphs 1 through 136.

138. The lack of recreation area, lack of adequate sanitation in the food area and in the blocks, lack of adequate ventilation, the absence of noise control, and the lack of critical fire safety features, and the other above listed conditions constitute cruel and unusual punishment and the denial of Due Process in violation of the Eighth and Fourteenth Amendments of the United States Constitution.

### SECOND CLAIM

139. As a second cause of action, Plaintiffs hereby reallege and incorporate paragraphs 1 through 136.

140. The lack of adequate legal materials, restrictive visitation procedures, as well as a general defeatist atmosphere created by the above described other conditions deprived Plaintiffs and their class rights secured under the Sixth and Fourteenth Amendments to the United States Constitution.

### THIRD CLAIM

141. As a Third cause of action, Plaintiffs hereby reallege and incorporate paragraphs 1 through 136.

142. The denial of adequate visitation and communication opportunities to Plaintiffs and the Class they represent deprives them of their rights to privacy in violation of the First, Fourth, Ninth, and fourteenth Amendments to the United States Constitution.

### FOURTH CLAIM

143. As a Fourth cause for action, Plaintiffs hereby reallege and incorporate paragraphs 1 through 136.

144. The arbitrary and summary discipline administered by the prison administration, the failure to enforce departmental rules, and the right to meaningful classification procedures constitutes a violation of rights guaranteed by the Sixth and Fourteenth Amendments to the United

Constitution.

FIFTH CLAIM

145. As a Fifth cause for action, Plaintiffs reallege and incorporate paragraphs 1 through 136.

146. The effects of being incarcerated at the State Prison of Southern Michigan are psychologically and physically debilitating and damaging. The Defendants have by their acts and omissions, inflicted emotional and psychological as well as physical injury upon the named Plaintiffs in violation of the First, Fourth, Sixth, Eighth, Ninth, and Fourteenth Amendments of the United States Constitution. As a direct and proximate result thereof Plaintiffs have sustained damages as follows:

- (a) Permanent and severe psychological and emotional trauma;
- (b) Pain and suffering, past and future;
- (c) Loss of earnings and economic capacity;
- (d) Medical expenses; past and future.

SIXTH CLAIM

147. The tenth cause for action Plaintiffs hereby reallege and incorporate paragraphs 1 through 136.

148. Defendants acts and omissions described herein, are in gross violation of Michigan Statutory law and regulations of the Michigan Department of Corrections; which claims this court should assume by means of pendent jurisdiction.

IRREPARABLE HARM

149. Plaintiffs and the class they represent have been, will be and are subjected to gross violations of their rights as citizens of the State of Michigan and of the United States. They are compelled to live in a demoralizing, dehumanizing, and barbaric environment which threatens their very lives.

150. Plaintiffs and the class they represent have no plan, or adequate remedy at law to redress thses herein described wrongs; Plaintiffs and the class they represent continue to suffer irreparable harm from the conditions and practices set forth herein unless and until the Declaratory relief sought is granted by this Court.

151. The public interest is well served when public officials obey the law and that to this end this court should exercise its' equity power.

#### REMEDIES AND RELIEF

WHEREFORE, the Plaintiffs on behalf of themselves and the class they represent, pray that this court:

1. Assume jurisdiction of this case and set down this cause promptly for hearing.

2. Determine by order, pursuant to Rule 23 a, B 1, and b 2 of the Federal Rules of Civil Proceedure, that this action should be maintained as a class action.

3. Pending a full hearing and determination by this Court, grant pursuant to Federal Rules of Civil Proceedure 65 (a), a preliminary injunction enjoining the Defendants, their successors in office, agents and employees and all other persons in active concert and participation with them from:

a) Threatening or punishing the Plaintiffs and all others cooperating with them for initiating, prosecuting and investigating this action.

b) Barring Plaintiffs attorneys, any designated representative of such attonreys, and any expert witness available for use in this case from entering and inspecting the State Prison of Southern Michigan in order to interview clients or witnesses for all purposes related to this litigation and in order to insure that the provisions of this protective injunction are complied with.

c) Incarcerating any additional persons within the Central Complex of Southern Michigan Prison until the present and incoming inmates are provided with:

(1) Sufficient living and recreation space and protection from harm to assure their physical safety;

(2) Sanction from placing inmates in any cell unless that cell meets the requirements of the Michigan Department of Corrections, and regulations issued by the American Correctional Association of the United States;

(3) Establishment of sufficient sanitation and janitorial services to maintain a clean and vermin free environment;

(4) Enforce DOC regulations concerning Health and Food requirements.

(5) Secure cell blocks to prevent theft.

(i) Such additional or alternative relief as the Court may deem just, proper and eq

4. Issue a Declaratory Judgment, Pursuant to 28 USC Sec. 2201, 2202, that through the individual and collective effort and their acts, practices and omissions, the Defendants have:

a) Subjected Plaintiffs and the class they represent to cruel and unusual punishment within the meaning of the Eighth and Fourteenth Amendments of the United States Constitution.

b) Failed to secure Plaintiffs rights that insure Plaintiffs be safe from harm and that their property be secure,

c) Deprived Plaintiffs and the class they represent to the right to be housed in prisons that meet requirements set forth by the American Correctional Association, and the Michigan Department of Corrections.

5. Order Defendants, within thirty (30) days, to submit a plan to the Court for assuring that all Plaintiffs and the class they represent are accorded all rights and privileges guaranteed to them by the United States Constitution and as citizens of the United States of America and the Plaintiffs and the class they represent are not subjected to punishment or violation of their constitutionally protected freedoms.

6. Order Defendants to refrain from harrassing, punishing, abusing, or retaliating against Plaintiffs for initiating this suit. Also, that Plaintiffs will not be transferred without their prior individual approval.



7. Order Defendants, within thirty (30) days to submit a plan to the Court for ongoing "amicus currie" inspection to insure that the Defendants are complying with this Courts Orders,

8. That if a satisfactory plan is not submitted and implimented within thirty (30) days, the Defendats be enjoined and restrained from incarcerating any and all Plaintiffs and the class they represent in the State Prison of Southern Michigan.

9. That if the Department of COrrrections cannot come up with a comprehensive plan to allieviate the above conditions, that the court order the United States Government to assume control the State Prison of Southern Michigan.

10. That the Court grant damages to the Named Plaintiffs, in the amount of twenty million dollars (20,000,000.00) for the psychological physical and economic loss incurred as inmates of the State Prison of Southern Michigan, plus costs, interests, and reasonable attorney fees.

11. That the Court retain jurisdiction over the Defendants and each of them, until such a time as the court is satisfied that the practices, conditions, policies and omissions alleged herein no longer exist and will not reoccur.

12. That the Court issue an order, appointing Plaintiffs and the class they represent a Federal attorney to assist Plaintiffs in this suit.

Dated: 8-12-80

Everett Hadix  
Everett Hadix #135207

Richard Mades  
Richard Mades #119138

Patrick C. Sommerville  
Patrick C. Sommerville #155825

Roosevelt Hudson Jr.  
Roosevelt Hudson Jr. #120618

Lee A. McDonald  
Lee A. McDonald #148724

Darryl A. Sturges  
Darryl A. Sturges #159541

Brent E. Koster  
Brent E. Koster #142253

Robert Flenster  
Robert Flenster #141243

#93451

Luther Covington  
LUTHER COVINGTON

FRANK THOMAS  
FRANK THOMAS

William Lovett  
William Lovett #118387