

(**PRINTER DANK** 11/24/85

Compliance

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

WILLIAM R. CODY,)
)
 Plaintiff,)
)
 v.)
)
 CAROLE HILLARD, et al.,)
)
 Defendants.)

Civ. 80-4039

Cody v. Hillard



PLAINTIFFS' RESPONSE TO DEFENDANTS' PROPOSED PLAN
FOR COMPLIANCE

I. INTRODUCTION

Plaintiffs have attempted a comprehensive review of defendants' proposals for compliance. Dr. Robert Powitz has reviewed the physical plant components of the plan. Dr. Ronald Sable has reviewed the medical component. Dr. Lloyd Baccus reviewed the mental health care component, and in addition toured the proposed Springfield facility along with plaintiffs' counsel. In addition, Mr. Daniel Manville, an associate with the National Prison Project, reviewed the access to courts component of the plans. All of these reviews were conducted on-site.

During these reviews, the state employees who assisted and answered questions were uniformly helpful and cordial. As will be apparent from comments in the body of this response, plaintiffs fully recognize that in a number of areas the State of South Dakota has proceeded with compliance with commendable energy and intelligence. Many of plaintiffs' concerns regarding

the initial compliance plans were satisfactorily addressed by defendants during informal discussions among the parties. Plaintiffs are pleased that we can join with defendants in urging adoption by the Court of much of the defendants' plans, and we will endeavor to continue this spirit of cooperation as implementation of the plans proceeds.

In the plans for compliance submitted by the defendants, there were a number of statements expressing disagreement with factual findings of the Court. These statements are, of course, not evidence. For that reason, and because some of the most objectionable statements have been modified or withdrawn in the amendments to the plans for compliance, plaintiffs will not here respond to such statements.

In plaintiffs' response to the defendants' plans for compliance, plaintiffs concur with the defendants' proposals in a number of areas. For those items, the plaintiffs urge that the Court enter an order incorporating the defendants' proposal in the remedial order of the Court, with compliance to be obtained by the date suggested by defendants. For construction projects in which the defendants have given an estimated completion date, plaintiffs suggest that the Court in its order set a date for completion one month later than the defendants' estimate. For example, the defendants estimate completion of the Federal Hall additional exit on April 12, 1985. Plaintiffs urge the Court to order its completion by May 12, 1985. By building this flexibility into the Court's order, the defendants' need to

return to court for minor revisions of the order should be eliminated.

In the areas in which the parties remain in disagreement, plaintiffs continue to hope that continuing discussions may lead to solutions acceptable to both sides.

II. ENVIRONMENTAL CONDITIONS-HOUSING

A. Fire Safety

1. Fire exits and stairs

The plaintiffs urge the Court to accept the defendants' proposed remedy and urge that the Court enter a remedial order incorporating the following provisions:

a) the defendants shall provide an additional fire exit from Federal Hall by May 1, 1985;

b) the defendants shall provide new fire stairs from East Hall and West Hall by May 15, 1985;

c) the defendants shall provide an additional fire exit from East Hall by July 6, 1985; and

d) the defendants shall provide an additional fire exit from West Hall by December 1, 1985.

2. Automatic unlocking system

The plaintiffs urge the Court to accept the defendants' proposed remedy and urge that the Court enter a remedial order incorporating the following provision:

the defendants shall provide that all cells used for inmate housing at the South Dakota State

Penitentiary (hereinafter SDSP) are equipped with an automatic cell unlocking system by April 20, 1986.

3. Fire separation barriers

The plaintiffs urge the Court to accept the defendants' proposed remedy and urge that the Court enter a remedial order incorporating the following provision:

the defendants shall provide for the installation of roll-up steel slot doors at the entrance to West and Federal Halls by July 6, 1985.

4. Emergency lights

The plaintiffs urge the Court to accept the defendants' proposed remedy and urge that the Court enter a remedial order incorporating the following provisions:

a) the defendants shall provide for emergency lights connected to the emergency generator by July 6, 1985; and

b) the defendants shall provide for two additional exit lights over the doorways in the converted exit from West Hall and one over the new exit from East Hall by February 28, 1985.

5. Adjustment Center fire safety

The defendants recently experienced a serious fire in the Adjustment Center that revealed significant inadequacies in the fire safety equipment for that housing area. Plaintiffs urge that the Court withhold entry of a remedial order on this matter pending submission of an appropriate remedial plan by the defendants.

6. Smoke and fire detection system

The plaintiffs do not challenge the defendants' statement of current compliance and urge that the Court enter a remedial order incorporating the following provision:

the defendants shall maintain a fire alarm system and smoke detector system in East, West and Federal Cell Halls.

7. Fire evacuation drills

The plaintiffs do not challenge the defendants' statement of current compliance and urge the Court to enter a remedial order incorporating the following provision:

the defendants shall conduct semi-annual unannounced fire drills in East, West and Federal Cell Halls and other appropriate areas of the SDSP.

8. Other fire safety measures

The plaintiffs urge the Court to accept the defendants' proposed remedy or, where applicable, do not challenge the defendants' statement of current compliance regarding other fire safety measures and urge the Court to enter a remedial order incorporating the following provisions:

a) the defendants shall maintain smoke exhaust fans in good working order in East, West and Federal Cell Halls;

b) the defendants shall continue the use of fire retardant mattresses and pillows, and the posting of fire evacuation instructions in every cell;

c) the defendants shall maintain emergency air masks and air tanks for staff use in the event of an emergency evacuation; and

d) the defendants shall submit to inspections by the Deputy Fire Marshal of the State of South Dakota and shall abate any deficiencies found as a result of such inspection.

B. Ventilation and Heating System

1. Cell ventilation and heating

Plaintiffs acknowledge that the defendants have taken certain remedial steps in this area. However, the ventilation in all three cellblocks remains seriously inadequate. Plaintiffs request that this Court schedule an evidentiary hearing regarding the adequacy of the defendants' remedial measures regarding heating and ventilation.¹

2. West Hall shower

The plaintiffs urge the Court to accept the defendants' proposed remedy and urge that the Court enter a remedial order incorporating the following provision:

the defendants shall maintain the West Hall shower in a safe and sanitary condition with adequate ventilation.

¹ Plaintiffs wish to continue to explore possible informal resolution of the remaining compliance issues, including this one. Should the parties reach an agreement on this, or others of the remaining issues, plaintiffs will promptly notify the Court.

C. Overhead Lighting and Electrical Wiring

1. Cell lighting

The plaintiffs urge the Court to accept the defendants' proposed remedy and urge that the Court enter a remedial order incorporating the following provision:

the defendants shall provide adequate cell lighting in East, West and Federal Cell Halls by July 6, 1985.

2. Cell wiring

The plaintiffs urge the Court to accept the defendants' proposed remedy and urge that the Court enter a remedial order incorporating the following provisions:

a) the defendants shall provide properly grounded outlets in West Cell Hall by February 28, 1985; and

b) the defendants shall provide a properly grounded second double outlet in East Cell Hall by July 6, 1985.

3. Removal of jerry-rigged wiring

The plaintiffs do not challenge the defendants' statement of current compliance and urge that the Court enter a remedial order incorporating the following provision:

the defendants shall maintain the cell areas free of improper wiring jerry-rigged by the occupants.

D. Hot Water and Water Control System

The plaintiffs urge the Court to accept the defendants' proposed remedy and urge that the Court enter a remedial order incorporating the following provisions:

a) the defendants shall provide a hot water system for individual cells in Federal Cell Hall by February 28, 1985; and

b) the defendants shall either provide proper plugs for sinks in individual cell halls by March 31, 1985; or

c) the defendants shall provide a temperature regulator for East and Federal Halls by February 25, 1985.

III. ENVIRONMENTAL CONDITIONS--KITCHEN AND FOOD STORAGE AREA

A. Milk Pasteurization Process

In view of the defendants' statement that they have ceased activities in this area shortly prior to the submission of their plans for compliance, plaintiffs are entitled to an order protecting them from a recurrence of the violations proven at trial. Accordingly, the plaintiffs urge that the Court enter a remedial order incorporating the following provisions:

a) should the defendants resume pasteurization operations, these operations shall be conducted in a safe and healthful manner;

b) should the defendants resume pasteurization operations, the defendants shall submit such operations to monthly inspections of milk samples and quarterly inspections of the monitoring equipment by the South Dakota Department of Agriculture; and

c) the defendants shall immediately abate any deficiencies found as a result of such inspections.

B. Food Storage

1. Basement food storage

The plaintiffs urge the Court to accept the defendants' proposed remedy with minor modification² and urge that the Court enter a remedial order incorporating the following provisions:

a) the defendants shall maintain all food storage areas in the SDSP in good repair and in a clean, healthful and vermin-free condition;³ and

b) the defendants shall maintain canopies or some other appropriate protective measure to ensure against unsanitary spillage from the overhead pipes in or around the stored food in the basement food storage area.

2. Kitchen food storage

The plaintiffs urge the Court to accept the defendants' proposed remedy or, where applicable, do not challenge the defendants' statement of current compliance and urge that the Court enter a remedial order incorporating the following provisions:

a) the defendants will complete scheduled improvements on the kitchen freezers and coolers by April 15, 1985;

² Some of the donnage in the basement food storage area needs replacement.

³ In plaintiffs' review of defendants' plans for compliance they learned for the first time that the defendants are now using a converted slaughterhouse at the SDSP for food storage. There are health and sanitation deficiencies in that facility.

b) the defendants will maintain proper methods of food storage in the kitchen.

C. Kitchen Elevator

The plaintiffs urge the Court to accept the defendants' proposed remedy and urge that the Court enter a remedial order incorporating the following provisions:

a) the defendants shall maintain the kitchen elevator in a safe operating condition and shall maintain safety buffer devices on the doors to prevent injuries; and

b) the defendants shall submit to inspections of the kitchen elevator at appropriate intervals and shall abate any deficiencies found as a result of such inspections.

D. General Kitchen Practices and Conditions

1. Ventilation

The plaintiffs urge the Court to accept the defendants' proposed remedy and urge that the Court enter a remedial order incorporating the following provision:

the defendants shall provide for adequate kitchen ventilation by August 15, 1985.

2. Kitchen fire safety

The plaintiffs urge the Court to accept the defendants' proposed remedy and urge that the Court enter a remedial order incorporating the following provision:

the defendants shall maintain ancillary fire protection systems for the kitchen stove hoods.

3. Utensil repair and sanitation

The plaintiffs urge the Court to accept the

defendants' proposed remedy and urge that the Court enter a remedial order incorporating the following provision:

the defendants shall maintain kitchen pots, pans and dining utensils in good repair and in safe and sanitary condition.

4. Inmate access to the infirmary through the kitchen

The plaintiffs recognize that the defendants cannot, because of basic design deficiencies in the SDSP, completely remedy this deficiency. Because this design deficiency cannot be remedied, plaintiffs believe that acceptance of the defendants' partial remedial action is preferable to requiring measures that could serve to delay emergency medical care on nights and weekends.

Accordingly, plaintiffs urge that this Court enter a remedial order incorporating the following provision:

the defendants shall prohibit inmate access to the infirmary through the kitchen during normal operational hours.

5. Kitchen food defrosting

The plaintiffs urge the Court to accept the defendants' proposed remedy and urge that the Court enter a remedial order incorporating the following provision:

the defendants shall maintain the food defrosting equipment in a safe and healthful manner, free from potential back siphonage.

6. Other kitchen practices

The plaintiffs urge the Court to accept the

defendants' proposed remedy and urge that the Court enter a remedial order incorporating the following provisions:

a) the defendants shall maintain the proper use of hair restraints among food service workers;

b) the defendants shall maintain the ice machine in good repair and in a sanitary condition; and

c) the defendants shall not allow use of any part of the kitchen area as a worker lounge or smoking area.

IV. ENVIRONMENTAL CONDITIONS--SHOPS AND VOCATIONAL PROGRAMS

A. Welding Shop

The plaintiffs urge the Court to accept the defendants' proposed remedy and urge that the Court enter a remedial order incorporating the following provision:

the defendants shall maintain adequate ventilation and toxic fume removal in the welding booths, sanding room and spray booths.

B. Furniture Upholstery Shop

The plaintiffs urge the Court to accept the defendants' proposed remedy and urge that the Court enter a remedial order incorporating the following provisions:

a) the defendants shall maintain adequate ventilation and toxic fume removal in the furniture upholstery shop; and

b) the defendants shall require that inmate workers in the furniture upholstery shop wear appropriate

protective devices when employed in the paint stripping and spraying booths.

C. Proper Storage of Combustibles

The plaintiffs urge the Court to accept the defendants' proposed remedy and urge that the Court enter a remedial order incorporating the following provision:

the defendants shall maintain safe and proper storage of combustible materials in the shops area.

D. Barbershop

The plaintiffs urge the Court to accept the defendants' proposed remedy and urge that the Court enter a remedial order incorporating the following provision:

the defendants shall maintain safe and sanitary conditions in the barbershops.

E. Safety Locking Devices

Although not reflected in defendants' submissions, the defendants have taken certain necessary corrective action in this area.⁴ The plaintiffs urge that the Court enter the following remedial order:

the defendants will maintain appropriate safety devices on machinery in the vocational shops.

F. Sawdust Removal

The plaintiffs urge the Court to accept the defendants' proposed remedy and urge that the Court enter a

⁴ The plaintiffs are prepared to show evidence that remedial action occurred.

remedial order incorporating the following provision:

the defendants shall provide a proper sawdust removal system in the carpentry shop by March 15, 1985.

V. ENVIRONMENTAL CONDITIONS--OTHER AREAS

A. Underground Corridor Lighting

The plaintiffs urge the Court to accept the defendants' proposed remedy and urge that the Court enter a remedial order incorporating the following provision:

the defendants shall provide adequate lighting in the underground corridor to the recreation building by February 28, 1985.

B. Sanitary Conditions in the Infirmary

The plaintiffs urge the Court to accept the defendants' proposed remedy and urge that the Court enter a remedial order incorporating the following provisions:

a) the defendants shall maintain proper sanitary conditions in the infirmary; and

b) the defendants shall maintain the infirmary free of potential back siphonage flows.

VI. DOUBLE-CELLING

The plaintiffs urge the Court to accept the defendants' proposed remedy and urge that the Court enter a remedial order incorporating the following provision:

the defendants shall end double-celling in all areas of the SDSP by August 31, 1985.

VII. MEDICAL AND DENTAL CARE

A. Use of Inmate Workers

The plaintiffs urge the Court to accept the defendants' proposed remedy and urge that the Court enter a remedial order incorporating the following provisions:

a) the defendants shall not employ inmate workers for tasks related to medical or dental health care, including the provision of direct care services; the scheduling of appointments or other involvement in determining the access of other inmates to health care services; and the operation of medical or dental equipment; and

b) the defendants shall provide that no inmate has access to the medical or dental records of other inmates.

B. Emergency Medical Care

1. Protocols

The protocols proffered to the Court by defendants require revision in light of the other changes in the emergency care plan urged by plaintiffs, infra. The plaintiffs urge that the Court enter a remedial order incorporating the following provision:

the defendants shall maintain proper emergency care protocols, including a provision setting forth the identification system for the emergency medical technician (EMT) on duty.

2. Emergency staff

Plaintiffs accept the defendants' proposed

remedy of providing one EMT per shift, provided that an appropriate system is developed so that all staff can identify the on-duty EMT, that EMT staff are limited to the use of emergency equipment for which they can be appropriately trained, and provided further that use of the SDSP infirmary is restricted in recognition of the night and weekend limited medical staff coverage. See plaintiffs' section V.C. and V.F., infra. Plaintiffs urge that the Court enter a remedial order incorporating the following provision:

the defendants shall provide that at least one certified EMT shall be on duty at the SDSP at all times by July 31, 1985.

3. Crash cart

The defendants' proposed plan fails to comply with this Court's decision regarding the necessity of a crash cart. At defendants' request, plaintiffs have supplied the defendants with information relating to two different acceptable crash cart formats. The plaintiffs urge that the Court enter a remedial order incorporating the following provision:

the defendants shall provide a crash cart for emergency use at the SDSP by June 1, 1985.

4. Resuscitation equipment

With the addition of a crash cart, the defendants' proposed remedy will be adequate. The plaintiffs urge the Court to enter a remedial order incorporating the following provision:

the defendants shall maintain proper

emergency resuscitation equipment.

C. Prescription Drugs

1. Formulary

The plaintiffs urge the Court to accept the defendants' proposed remedy and urge that the Court enter a remedial order incorporating the following provision:

the defendants shall maintain an appropriate formulary of the prescription medications utilized at the SDSP.

2. Prohibitions on prescription of certain medications

The plaintiffs urge the Court to accept the defendants' proposed remedy and urge that the Court enter a remedial order incorporating the following provision:

the defendants shall not prohibit the prescription of sleeping medications, pain relievers, minor tranquilizers, appetite suppressants, and cough medicines by qualified physicians when medically appropriate in accordance with general medication policies of the SDSP.

3. Limitations on prescription of certain medications

Provision 6 on p.6 of the defendants' revised proposed health protocols is improper and should be deleted. Plaintiffs urge that the Court enter a remedial order incorporating the following provision:

the defendants shall not discourage or limit the prescription of anti-convulsive and anti-asthmatic medications by qualified physicians when medically appropriate in

accordance with general medication policies of the SDSP.

4. Medication dispensation

The plaintiffs urge the Court to accept the defendants' proposed remedy and urge that the Court enter a remedial order incorporating the following provision:

the defendants shall maintain a system in which the administration of a prescribed medication, or the inmate's refusal of such medication, is recorded.

5. Monitoring of inmates receiving major tranquilizers

The plaintiffs urge the Court to accept the defendants' proposed remedy and urge that the Court enter a remedial order incorporating the following provision:

the defendants shall provide for appropriate medical monitoring of all inmates receiving major tranquilizers.

C. Protocols

The defendants' proposed remedy partially conforms with this Court's decision. In a number of important respects, however, the revised proposed protocols (1/11/85) are defective, as follows:

Section I-A-11(p.2): This section should reflect the identification system for EMT personnel. In addition, some crash cart equipment should not be used by EMT personnel. Accordingly, this section should provide that EMT personnel will use emergency equipment for which they are properly trained.

Section I-B-1(p.2): This section should set

forth limits on the use of the infirmary. Because the infirmary will not be staffed with medical staff continuously, no inmate needing nursing care should be admitted unless special appropriate staff coverage is provided. The infirmary should not be used on an overnight basis at all unless a staff member is continuously present.

Section I-D-6(p.9): Appropriate staff coverage is provided. The infirmary should not be used on an overnight basis at all unless a staff member is continuously present.

Section I-D-6(p.6): This provision is inconsistent with the Court's decision and should be deleted.

Section I-6(p.6): No one on the medical staff could explain the meaning of this section, and this section has no apparent operational meaning. According to the information yet supplied the plaintiffs by defendants, the SDSP has yet to devise a quality control program.

Section II-C-1(p.12): These sections lack appropriate detail to comply with the Court's decision.

Section II-E-3(p.14): This section fails to give meaningful guidelines regarding the distinction between elective and non-elective procedures.

Section II-F.(p.14): This section is inconsistent with the Court's decision and should be deleted or completely rewritten.

The plaintiffs urge that the Court enter a remedial order incorporating the following provision:

the defendants' proposed health care protocols (1/11/85) shall be revised to reflect the Court's findings regarding emergency care, staffing, prescription drugs, quality control, financial constraints on the provision of medical and dental care, and protocols.

D. Medical Records

Plaintiffs' review of the defendants' medical records found them to be, if anything, more chaotic than at the time of the plaintiffs' original review of the records. The defendants need to submit a specific plan detailing the steps that will be taken to correct deficiencies in this area. Plaintiffs urge that the Court enter an order incorporating the following provision:

the defendants shall organize existing medical files at the SDSP and shall provide that medical files are maintained in the chart order prescribed in the defendants' health care protocols. (Section I-C-1) (p. 3-4)

E. Quality Control

The defendants have failed to develop any meaningful system of quality control for health services at the SDSP. The plaintiffs urge that the Court enter a remedial order incorporating the following provision:

the defendants will develop and implement a meaningful system of quality control for health services by March 31, 1985.

F. Staff

Plaintiffs accept the defendants' proposed remedies

provided that (a) a system for the identification of the EMT on duty by other staff is developed; (b) EMT are limited to the use of emergency equipment for which they can be appropriately trained; (c) a staff member is continuously present when the infirmary is used on an overnight basis; and (d) nursing staff is continuously provided in the infirmary when inmates needing nursing care are present. The plaintiffs urge that the Court enter a remedial order incorporating the following provisions:

a) the defendants shall maintain adequate medical staff at the SDSP;

b) the defendants shall provide staff coverage on a 24-hour basis when an inmate is admitted to the infirmary; and

c) the defendants shall provide nursing staff coverage on a 24-hour basis when an inmate needing nursing services is admitted to the infirmary.

G. Financial Constraints on Medical and Dental Services

As noted supra in Section VII.C., the defendants have failed to comply with the Court's decision because the defendants' proposed protocols contain inappropriate references to financial constraints on medical and dental services and fail to provide guidelines to distinguish elective and non-elective services. In addition, plaintiffs' review found evidence that members of the class continue to be denied appropriate access to services for financial reasons. Clear and detailed protocols, particularly in the dental area, would assist in curing this deficiency. Plaintiffs urge that the Court enter a remedial order incorporating the following provisions:

a) the defendants shall provide necessary medical, surgical and dental care;

b) the defendants shall provide necessary protheses free of cost to indigent inmates; and

c) the defendants shall provide that medical judgments regarding necessary treatment shall not be overridden by non-medical staff for financial reasons.

VIII. PSYCHIATRIC AND PSYCHOLOGICAL CARE

A. Staff

1. Staff at SDSP

The plaintiffs urge the Court to accept the defendants' proposed remedy and urge that the Court enter a remedial order incorporating the following provisions:

a) the defendants shall employ an additional clinical psychologist at the SDSP by June 30, 1985;

b) the defendants shall, at a minimum, maintain the current staffing level for correctional counselors, specialized counselors, and psychiatric services.

2. Staff at the forensic unit

Plaintiffs cannot evaluate the appropriateness of the defendants' proposed remedy until they receive a specific break-down of the type of staffing to be provided at the forensic unit. Should this information not be forthcoming to the Court and the plaintiffs, plaintiffs urge that the Court enter a remedial order incorporating the following provision based on paragraph H.3.F. (p.35) of the Court's findings of fact:

the defendants shall provide an acute and intermediate level care facility staffed by a psychiatrist, two psychologists, six nurses, four counselors or psychiatric social workers and necessary correctional staff.⁵

IX. INTAKE AREA

The plaintiffs urge the Court to accept the defendants' proposed remedy and urge that the Court enter a remedial order incorporating the following provision:

the defendants shall provide proper initial medical screening for newly-admitted inmates.

X. ACCESS TO THE COURTS

A. Access at the SDSP

Contrary to the Court's order, the defendants have failed to prepare a plan for compliance regarding SDSP inmates' access to the Courts. In view of the defendants' failure to propose their own remedy, the plaintiffs urge that the Court enter a remedial order incorporating the following provisions:

a) the defendants shall institute a formal training program for inmate law clerks at the SDSP that will train such clerks in the fundamentals of legal research, state and federal court procedures, criminal law, prisoners' rights, post-conviction remedies, and general civil matters;

⁵ Plaintiffs are prepared to discuss with defendants deviations from this formula so long as the overall level of services provided will not be compromised.

b) the defendants shall provide four trained law clerks for the assistance of inmates at the SDSP;

c) the defendants shall provide by regulation that the law clerks shall not discriminate against an inmate because of his race, religion or the nature of his sentence; and

d) the defendants shall provide by regulation that the law clerks are available for assistance in the area of prisoners' rights.

B. Access at the Springfield Facility

Plaintiffs believe that the concept of utilizing lawyers to satisfy inmates' needs for legal assistance at the Springfield facility is a highly commendable one. The defendants' submission, however, gives no information regarding the defendants' proposed remedy. As an interim matter, this Court should order the defendants to submit information in the following areas regarding their plans for legal access at Springfield: (1) number of hours per week services will be offered; (2) priorities for service of inmate needs; (3) type of services to be offered (e.g., advice, research memoranda, pleadings drafting); and (4) legal areas in which services will be offered (e.g., post-conviction relief; prisoners' rights; ordinary civil matters).

When the above information has been submitted to the Court, and plaintiffs have had an opportunity to comment on the proposal, the Court can enter an appropriate order on this issue.

Respectfully submitted,

Douglas Cummings / DCB
Douglas Cummings
Cummings Legal Clinic
617 West 11th Street
Sioux Falls, SD 57104

Bill Froke / BJS
Bill Froke
East River Legal Services
329 North Phillips Avenue
Sioux Falls, SD 57102

Elizabeth Alexander / EAS
Elizabeth Alexander
National Prison Project
of the American Civil
Liberties Union
Foundation, Inc.
1346 Connecticut Ave., NW
Suite 402
Washington, D.C. 20036
202/331-0500