

RAYMOND G. JACKSON

Plaintiff

- VS -

Civil Case No. 06-1241 (CKK) (MF)

(1) Correctional Corp. of America

1901 E St S.E WASH. D.C. 20003

(2) Center for Correctional Health Policy and Studies Inc.

1015 15th St. N.W. Suite 1000 WASH. D.C. 20005

Defendants

RECEIVED

JAN - 8 2007

MARKY MAYER-WHITTINGTON, CLERK
U.S. DISTRICT COURT

Amended Complaint

On or around March 27, 2005 I arrived at Central Treatment Facility formerly Correctional Corp. of America. I was examined by doctor and at that time it was determined that I could not be placed on a top bunk. At that time the doctor issued a bottom bunk certificate to provide to staff and the Administrative Office. I was placed on a top bunk bed despite the doctors order for me to not be put on a top bunk bed. I informed staff officers and Administrative Staff members of that doctor order and was ignored. I was placed on a top bunk for 30 days total and suffered pain in legs, lower back, knees and hips. I was diagnosis with restless leg Syndrome, abnormalities of the nerves in both legs, arthritis of spine and knees. This is why it was determined that I could not climb up and down on a top bunk. On January 19, 2006 I informed medical staff of stomach medication for gastritis and reflux. Medical Staff was aware of this problem and refused to prescribe

Necessary medication that I had been taking since arriving at Central Treatment Facility. I suffered abdominal pain for 19 days when medical staff was provided with a medical summary advising them to follow up on stomach pain by P.A. Margaret Hale. She advised medical with a summary of prescribed medication from F.C.I. Butner N.C.. Also the neurologist ordered additional mattress which staff members denied providing this mattress for 8 days. This all was medical negligence and 8th Amendment violation of cruel and unusual punishment. Correctional Corporation of America has also violated my prisoners rights and additional 8th Amendment violations. I was kept in a flooded cell for 12 days due to a broke water pipe instead of being moved to a dry cell violates my 8th Amendment right. Also a 8th Amendment violation when I was kept in a cell with no air condition during the hottest time in the summer months. I am asking for monetary damages of 1,000.00 day for 30 days plus punitive damages, 500.00 day for 19 days plus punitive damages, 150.00 day for 12 days plus punitive damage, 100.00 day for 8 days and a total of 42,100.00 plus punitive damages.
