

# EXHIBIT A

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**DAVID OLABAYO OLANIYI,**

Plaintiff,

-against-

**DISTRICT OF COLUMBIA, ET AL.,**

Defendants.

Civil No. 05-455 (RBW)

**DECLARATION OF DAVID OLABAYO OLANIYI**

David Olabayo Olaniyi declares as follows:

1. I am the Plaintiff in the case of Olaniyi v. District of Columbia, et al., now pending before the United States District Court for the District of Columbia.

2. On March 6, 2003, I traveled to Washington, D.C. to visit the area and conduct research for my artwork and a stage play in development. While I was in Washington, D.C., I visited the United States Capitol Building (the "Capitol") wearing a piece of art I had constructed from various materials in the environment. While in the Crypt area of the Capitol, I was stopped, searched, and arrested by officers of the United States Capitol Police (USCP). I was subsequently searched and interrogated by law enforcement officers with the USCP and various other Federal agencies.

3. After being interrogated (without an attorney) by several federal agents, I was taken to the D.C. Jail and placed in a holding cell.

4. On March 7, 2003, I was taken to Court and ordered held without bond. I was returned to the D.C. Jail.

5. On March 7, 2003, I was examined by personnel at the D.C. Jail. The D.C. Jail personnel had an x-ray taken of my chest and performed a physical examination. I was also given a mental health assessment. I explained the circumstances of my arrest to Darius Mills, the individual who interviewed me for the mental health assessment. I explained that I was an artist in Washington doing research for my artwork and stage play in development. Prior to my imprisonment in the D.C. Jail, I had never been diagnosed or treated for any mental disease, illness, or condition.

6. I learned that I was ordered to be imprisoned in the psych-ward (or Mental Health Unit) of the D.C. Jail. I was told that I had "delusions of grandeur." I do not suffer from delusions of grandeur and have not suffered from such delusions. While in the D.C. Jail (and the Mental Health Unit), I observed horrible scenes such as other inmates who were foaming at the mouth and constantly barking like dogs. I heard other inmates constantly screaming, and loud clanging noise of the doors and cells in the Jail. I was treated like one of them -- one of the insane inmates barking like a dog, foaming at the mouth, or constantly screaming.

7. D.C. Jail personnel informed me that I had diabetes and would be receiving treatment for this condition. I had never been diagnosed with diabetes. I told the D.C. Jail personnel that I had never had diabetes and that I did not want any treatment for it. The D.C. Jail personnel ignored me and told me that I could "either cooperate or be physically restrained while [they] inject" me with medication. Late on the night of March 7, 2003 or early in the morning on March 8, 2003, against my will, I was injected with a medication that made me lose consciousness until the next morning. Because I lost consciousness, I believe that the D.C. Jail personnel injected me with an antipsychotic and/or psychotropic drug.

8. On March 10, 2003, I was released from the D.C. jail after posting bond.

9. While in the D.C. Jail, I endured severe emotional distress and continue to suffer from such distress. I suffer from regular headaches, a sleep disorder, depression, and paranoia due to that distress and the horrors of my imprisonment. I continue to suffer from memories of my time in the Mental Health Unit, including hearing other inmates screaming in my head.

10. I am afraid to go to any physician or health care provider because of my experience at the D.C. Jail and the severe emotional trauma I suffered at the hands of the D.C. Jail personnel.

I declare under penalty of perjury that the foregoing is true based on my knowledge, information, and belief.

  
\_\_\_\_\_  
David Olabayo Olamiyi

8/16/07  
\_\_\_\_\_  
Date