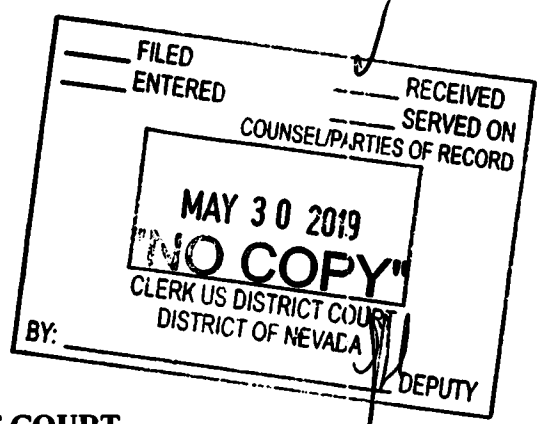


NATHAN DOUGLAS LAWRENCE
 Name
775 W. SILVER STREET
ELKO, NEVADA 89801
#1313302 (EC50)
 Prison Number



**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

NATHAN DOUGLAS LAWRENCE,)
 Plaintiff,)
 vs.)
COUNTY OF ELKO,)
SHERIFF, ADOR NARJIZA,)
ELKO COUNTY SHERIFFS OFFICE,)
JOHN C. CARPENTER LAW ENFORCEMENT,)
MEDALIUS MEDICAL CARE ET AL.)
 Defendant(s).)

CASE NO. 3:19-cv-00284
 (To t

**CIVIL RIGHTS COMPLAINT
 PURSUANT TO
 42 U.S.C. § 1983**

A. JURISDICTION

1) This complaint alleges that the civil rights of Plaintiff, NATHAN DOUGLAS LAWRENCE,
 (Print Plaintiff's name)
 who presently resides at 775 W. SILVER STREET ELKO, NV. 89801, were
 violated by the actions of the below named individuals which were directed against
 Plaintiff at JOHN C. CARPENTER LAW ENFORCEMENT CENTER, ELKO on the following dates
 (institution/city where violation occurred)
MARCH 17th - PRESENT, MAY 1st - PRESENT, and MARCH 17th - PRESENT.
 (Count I) (Count II) (Count III)

Make a copy of this page to provide the below information if you are naming more than five (5) defendants

2) Defendant COUNTY OF ELKO, NV. resides at 775W. SILVER STREET ELKO, NV 89801,
(full name of first defendant) (address if first defendant)
and is employed as GOVERNMENT ENTITY, AGENCY, ETC.. This defendant is sued in his/her
(defendant's position and title, if any)
 individual official capacity. (Check one or both). Explain how this defendant was acting

under color of law: THE COUNTY OF ELKO, A GOVERNMENT AGENCY ACTING UNDER STATE LAW

3) Defendant SHERIFF AZTOR NAJARA resides at 775W. SILVER STREET ELKO, NV. 89801,
(full name of first defendant) (address if first defendant)
and is employed as SHERIFF OF ELKO COUNTY. This defendant is sued in his/her
(defendant's position and title, if any)
 individual official capacity. (Check one or both). Explain how this defendant was acting

under color of law: SHERIFF AZTOR NAJARA IS EMPLOYED AS A COUNTY EMPLOYEE WHEN PERFORMING HIS DUTIES AND RESPONSIBILITIES UNDER COLOR OF STATE LAW

4) Defendant ELKO COUNTY SHERIFFS OFFICE resides at 775W SILVER STREET ELKO, NV. 89801,
(full name of first defendant) (address if first defendant)
and is employed as LAW ENFORCEMENT AGENCY/GOVNT.. This defendant is sued in his/her
(defendant's position and title, if any)
 individual official capacity. (Check one or both). Explain how this defendant was acting

under color of law: A GOVERNMENT AGENCY LEASED BY COUNTY OF ELKO NEVADA

5) Defendant JOHN L. CARPENTER LAW CENTER resides at 775W. SILVER STREET ELKO, NV 89801
(full name of first defendant) (address if first defendant)
and is employed as OWNED/LEASED BY COUNTY OF ELKO. This defendant is sued in his/her
(defendant's position and title, if any)
 individual official capacity. (Check one or both). Explain how this defendant was acting

under color of law: A GOVERNMENT AGENCY LEASED/OPERATED BY (ELSO) COUNTY OF ELKO, NEVADA

6) Defendant MEDALLUS MEDICAL CARE resides at 775 W. SILVER STREET ELKO, NV.
(full name of first defendant) (address if first defendant)
and is employed as Contractual Vendor of Medical/Mental Health This defendant is sued in his/her
(defendant's position and title, if any)
 individual X official capacity. (Check one or both). Explain how this defendant was acting

under color of law: Being Contractual Vendor of Medical/Mental Health Duties, Services, Obligations, Policies etc. for (ECSD) & (JCLLEC)

7) Jurisdiction is invoked pursuant to 28 U.S.C. § 1343 (a)(3) and 42 U.S.C. § 1983. If you wish to assert jurisdiction under different or additional statutes, list them below.

PLEASE SEE ATTACHED EXHIBITS 7) A-F
MORALES FELICIANO V. ROSELLO GONZALEZ, 13 F. Supp. 2d 151, 210 (P.R.1998)

B. NATURE OF THE CASE

1) Briefly state the background of your case.

Contained Within the Following three Counts I will Present that the Elko County, Elko County Sheriff Aitor Narvigo, Elko County Sheriff Office (ECSD), John C. Carpenter Law Enforcement Center (JCLLEC) Medallus Medical Care (MMC), Dr. Rachot, Sheriff Lt. Mike Silva have all jointly or separately, have violated my Civil Rights by Ignoring, Dismissing, Violating & Abusing Policies, Procedures, Practices, Occupational Duties, Contracts, Leases and agreements held in conjunction with one another or separately in regards to arrestees and detainees held in their custody/control and for their protection as well as safety, and to provide them with access and services/treatment of medical and mental health issues, concerns etc. as that of a normal person in the community or per ^{promis} contracts, policies, leases etc. demands.

C. CAUSE OF ACTION

7)^(A) CONTINUED FROM Pg. 3

- BOSWELL V. SHERBURNE COUNTY, 849 F.2d 1117, 1123 (10th Cir. 1988).
- KRUGER V. JENNE, 164 F. Supp. 2d 1330, 1331 (S.D. Fla. 2000)
- NELSON V. PRISON HEALTH SERVICES, INC., 991 F. Supp. 1452, 1465 (M.D. Fla. 1999)
- BROWN V. COUGHLIN, 758 F. Supp. 876, 889 (S.D. N.Y. 1991)
- JONES V. EVANS, 544 F. Supp. 769, 779 (N.D. Ga. 1982)
- LAUENDER V. LAMPERT, 242 F. Supp. 2d 821, 840 (D. Or. 2002)
- HARRIS V. THEGTEN, 991 F.2d 1495, 1505 (11th Cir. 1991); DEGIDIO V. PUNG, 920 F.2d 525, 533 (8th Cir. 1990)
- TADARO V. WARD, 565 F.2d 48, 52, (2d Cir. 1977)
- ROBERT E. V. LANE, 530 F. Supp. 930, 940 (N.D. Ill. 1981)
- Thompson V. BERT, 828 F.2d 298, 305 (5th Cir. 1987)
- GIBSON V. COUNTY OF WASHOE NEV., 290 F.3d 1175, 1190-91 (9th Cir. 2002)
- MORALES FELICIANO V. ROSELLO GONZALES, 13 F. Supp. 2d 151, 210 (D.P.R. 1998)
- MATHIE V. FIDES, 935 Supp. 1284, 1307 (E.D. N.Y. 1990) AFFO, 121 F.3d 808 (2d Cir. 1997)
- GREASON V. KEMP, 891 F.2d 829, 835 (11th Cir. 1990)
- GERON V. CORRECTIONS CORP. OF AMERICA, 191 F.3d 1281, 1286 (10th Cir. 1999)
- CARRIGAN V. STATE OF DELAWARE, 957 F. Supp. 1376, 1383-85 (D. Del. 1997)
- BELL V. WOLFISH, 441 U.S. 520, 559, 99 S.Ct. 1861 (1979)
- HUGHES V. JOINET COMMERCIAL CENTER, 931 F.2d 425, 428 (7th Cir. 1991)
- U.S. V. DEARBES, 319 F.3d 579, 581-83 (1st Cir. 2004)
- HARTMAN V. COMMERCIAL MEDICAL SERVICES, INC. 991 F. Supp. 1452, 1465 (M.D. Fla. 1999)
- SEGIAN V. CLARK COUNTY, 142 F. Supp. 2d 1264, 1269 (D. Nev. 2001)
- JACKSON V. FAUVER, 334 F. Supp. 2d 697, 744 (D. N.J. 2004)
- H.L. by HOWITT V. JARRARD, 786 F.2d 1080, 1083, 1087 (11th Cir. 1986)
- MCKUKEN J. SMITH, 974 F.2d at 1050, 1060, (9th Cir. 1992)
- NEWMAN V. ALABAMA, 503 F.2d 1320, 1331 (5th Cir. 1974)
- LIGHTFOOT V. WALKER, 486 F. Supp. 504, 522-24 (S.D. Ill. 1980)
- LEWIS V. WALLENSEEEN, 969 F.2d 1173, 1184-85 (7th Cir. 1985)
- ARNOLD ON BEHALF OF H.B. V. LEWIS, 803 F. Supp. 246, 257 (D. Ariz. 1992)

7) ^(B) CONTINUED FROM Pg. 3

- Hoptower v. Ray, 682 F.2d at 1252-53
- U.S. v. STATE of MICHIGAN, 680 F. Supp 928, 1043-45, 1061 (W.D. Mich. 1987)
- MORRELL v. ALVAREZ, 872 F.2d 577, 581 (4th Cir. 1989)
- MALDONADO v. TERHUNE, 28 F. Supp. 2d 284, 290 (D. N.J. 1998)
- TOLLEY v. OWENS, 719 F. Supp. at 1302-1303
- LANGLEY v. COUGHLEN, 888 F.2d 252, 254 (2nd Cir. 1988)
- GIBSON v. HANCOCK County of WASHOE NEV., 290 F.3d 1175, 1189 (9th Cir. 2002)
- CLEMAN v. WELSON, 912 F. Supp. 1282, 1298 & N.10, 1305-06 (E.D. Cal. 1995)
- TATE v. DRAGOVICH, 2003 WL 21978141, *9 (E.D. Pa., Aug. 14, 2003)
- THOMAS v. THOMAS, 2007 WL 2177066, *6 (S.D. Ga., July 25, 2007)
- LANGLEY v. COUGHLEN, 715 F. Supp. at 544-49
- SULTAN v. WRIGHT, 265 F. Supp. 2d 292, 300 (S.D. N.Y. 2003)
- BASS by LEWIS v. WALLENSTEIN, 769 F.2d at 1184-86 (7th Cir. 1985)
- JONES v. JOHNSON, 781 F.2d 769, 771-72 (9th Cir. 1986)
- FARRER v. CONCRETE'S Corp of AMERICA, 403 F.3d 1134, 1144-45 (10th Cir. 2005)
- WOOD v. HANCOCK County SHERIFFS DEPT., 354 F.3d 57, 59-61, 63, 65 (1st Cir. 2003)
- ROBERTSON v. PAGE, 170 F.3d 747, 748 (7th Cir. 1999)
- Campbell v. City of PHILADELPHIA, 1990 WL 102945, *6 (E.D. Pa. July 18, 1990)
- WOODWARD v. CORRECTIVAL MEDICAL SERVICES OF ILLINOIS, INC., 368 F.3d 917, 930 (7th Cir. 2004)
- City of NEWPORT v. FACT CONCRETS, INC., 453 U.S. 247, 262-63, 101 S. Ct. 2748 (1981)
- TOUSSIE v. Buxell, 323 F.3d 178, 183 (2d Cir. 2003)
- HANSON v. Edmond, 192 F.3d 1342, 1345-47 (11th Cir. 1999) 205 F.3d 1244 (11th Cir. 2000)
- HELLING v. McKENNEY, 509 U.S. 25, 32, 113 S. Ct. 2475 (1993)
- SCHER v. Engelke, 943 F.2d 921, 924 (8th Cir. 1991)
- Kingsley v. Beven of Parsons, 937 F.2d 26, 32 (2nd Cir. 1991)
- MCLAIRN v. PRATER, 30 F.3d 982, 984 (8th Cir. 1994)
- Jordan v. Gardner, 986 F.2d 1521, 1530 (9th Cir. 1993) (en banc)
- GREENO v. Doty, 414 F.3d 645, 655 (7th Cir. 2005)
- FARMER v. BRENNAN, 511 U.S. 825, 842-43, 114 S. Ct. 1970 (1994)

7)(C) CONTINUED FROM Pg. 3

- HOWELL V. EVANS, 922 F.2d 712, 719 (11th Cir. 1991)
- HATHAWAY V. COUGHEN, 99 F.3d 550 (2d Cir. 1996)
- BUTLER V. DOWD, 979 F.2d at 675
- VASBURG V. SOLEM, 845 F.2d 763, 767 (8th Cir. 1988)
- SHREADER V. WHITE, 761 F.2d 975, 979 (4th Cir. 1985)
- ROLAND V. JOHNSON, 856 F.2d 764, 770 (6th Cir. 1988)
- RUIZ V. ESTELLE, 37 F. Supp. 2d 855, 928 (S.D. Tex. 1999)
- GOKA V. BOBBITT, 862 F.2d 646, 652 (7th Cir. 1988)
- POOL V. MO. DEPT. OF CORRECTIONS & HUMAN RESOURCES, 883 F.2d 640, 645 (8th Cir. 1989)
- BOONE V. SIROD, 706 F. Supp. 636, 638 (N.D. Ill. 1989)
- WILKS V. YANIG, 897 F.2d 896, 898 (7th Cir. 1990)
- ANDERSON V. GUTSCHENMITTER, 836 F.2d 346, 349 (7th Cir. 1988)
- PAGE V. NOBLE, 186 F. Supp. 2d 1134, 1139 (D. Ore. 2000)
- BOWLES V. COUNTY OF ESSEX, 118 Misc.2d 943, 461 N.Y.S.2d 959, 961 (N.Y.S. 1983)
- YARUF V. U.S., 642 Supp. 415, 428 (M.D. Pa. 1986)
- WOLF V. HOEN, 130 F. Supp. 2d 648, 659 (E.D. Pa. 2001)
- CARNELL V. GRAMM, 872 F. Supp. 746, 756 (D. Haw. 1994)
- CARRIGAN V. STATE OF DELAWARE, 957 F. Supp. 1376, 1384 (D. Del. 1997)
- CONNOR V. DONNELLY, 42 F.3d 220, 223 (4th Cir. 1994)
- CARSON V. MORALE, 2008 WL 822150, *4 (W.D. Mich., Mar. 26, 2008)
- JONES V. BOCK, 549 U.S. 199, 212-217, 127 S. Ct. 910 (2007)
- BAKER V. ALLEN, 2006 WL ~~1128712~~ 1128712, *9 (D.N.J., Apr. 24, 2006)
- BAFFORD V. SAMMINS, 2001 WL 167574, *4 (D. Kan., Nov. 7, 2001)
- SNEDDER V. MELINDEZ, 199 F.3d 108, 114 (2d Cir. 1999)
- BROWN V. VALOFF, 422 F.3d 926, 940 (9th Cir. 2006)
- CONNOR V. MANTFEE, 2006 WL 2668977, *2 (D. Ariz. Sept. 14, 2006)
- CLAUSEN V. GOODSON, 2005 WL 3213914, *3 (E.D. Mo., Nov. 30, 2005)
- MONROE V. FLETCHER, 2006 WL 1699701, *2 (W.D. Va., June 12th, 2006)
- ORTIZ J. KELWIST, 2006 WL 2583714, *2 (S.D. Ill. Aug. 3, 2006)
- LIVINGSTON V. PISKOR, 215 F.R.D. 84, 85-86 (W.D. N.Y. 2002)

7) (D) CONTINUED FROM Pg. 3

- KENDALL V. KOTTIC, 2004 WL 1752818 *5 (S.D.N.Y. AUG. 4 2004)
- MANDEVILLE V. ANDERSON, 2007 WL 4287724, *3-4 (D.N.H., DEC. 4 2007)
- COLLINS V. MCCAUGHTRY, 2005 WL 503818, *2 (W.D.WES. FEB. 28 2005)
- FORTNER V. THOMAS, 983 F.2d 1024, 1030 (11th Cir. 1993)
- N.G. V. CONNECTICUT, 382 F.3d 225, 234 (2d Cir. 2004)
- STANLEY V. HENSON, 337 F.3d 961, 963-64 (2d Cir. 2003)
- MELTON V. U.S., 191 F. Supp. 2d 179, 182-93 (D.D.C. 2002)
- LAVERDER V. CAMPBELL, 242 F. Supp. 2d 821, 840 (D. OR. 2002)
- JONES V. EVANS, 544 F. Supp. 769, 777 (N.D. GA. 1982)
- BROWN V. COUGHLIN, 758 F. Supp. 876, 889 (S.D. N.Y. 1991)
- GIBSON V. COUNTY OF WASHOE NEV., 290 F.3d 1175, 1190-91 (9th Cir. 2002)
- NELSON V. PRISON HEALTH SERV. INC., 991 F. Supp. 1452, 1465 (M.D. PA. 1997)
- KRUGER V. JENNE, 164 F. Supp. 2d 1330, 1331 (S.D. Fla. 2000)
- HARPER V. THIBPEN, 941 F.2d 1495, 1505 (11th Cir. 1991); DECEDEC V. PUNO,
920 F.2d 525, 533 (8th Cir. 1990)
- TODARO V. WARD, 565 F.2d 48, 52 (2d Cir. 1977)
- ROBERT E. V. LANE, 530 F. Supp. 930, 940 (N.D. ILL. 1981)
- CREASON V. KEMP, 891 F.2d 839, 837-40 (11th Cir. 1990)
- FELDER V. CASEY, 487 U.S. 131, 108 S. Ct. 2302 (1988)
- COLLOWAY V. CITY OF NEW ORLEANS, 524 So. 2d 182, 186 (La. App.)
- WOODFORD V. NGO, 548 U.S. 81, 101, 126 S. Ct. 2378 (2000)
- STEWART V. CENTRAL ARIZONA CORRECTIONAL FACILITY, 2009 WL 3756504
*3 (D. ARIZ., NOV. 9 2009) & WL 5184466 (D. ARIZ. DEC. 22 2009)
- MEADOR V. PLEASANT VALLEY STATE PRISON 328 Fed. Appx. 177, 178 (9th Cir. 2009)
- ANDERSON V. XYZ CORRECTIONAL HEALTH SERVICES, INC. 407 F.3d at 682-85
- AMICKER V. GOOD, 1999 WL 5190, *4-5 (S.D.N.Y. July 20 1999)
- BRANCH V. BROWN, 2003 WL 2173079, *12 (S.D.N.Y. July 25, 2003)
- EDWARDS V. HANS, 2008 WL 5377995, *2 (U.D. Cal., DEC. 23 2008)
- HARVEY V. PONDER, 2008 WL 5071131 *3 (N.D. CAL., NOV. 26, 2008)
- CARBE V. LAPPEN, 492 F.3d 325 (5th Cir. 2007)
- HARRMAN V. CORRECTIONAL MENTAL SERV. INC., 960 F. Supp. 1577, 1581-83 (M.D. PA. 1996)

7) (E) CONTINUED FROM Pg. 3

- FRENCH V. OWENS, 771 F.2d 1250, 1254 (7th Cir. 1985)
- RAMOS V. LAMM, 639 F.2d 559, 575 (10th Cir. 1980)
- *NEWMAN V. ALABAMA, 503 F.2d 1320, 1331 (5th Cir. 1974)
- GONZALES V. MARTINEZ, 403 F.3d 1179, 1186-88 (10th Cir. 2005)
- HAMMOND V. GORDON COUNTY, 316 F.Supp.2d 1262, 1288-90 (N.D. Ga. 2002)
- TROYA V. SALAZAR, 576 F.3d 912 (10th Cir. 2008)
- U.S. V. STATE OF MICHIGAN, 680 F.Supp. 928, 1043-45, 1061 (W.D. Mich. 1987)
- PARTEE V. LANE, 528 F.Supp. 1254, 1259-61 (N.D. Ill. 1981)
- TOUSSAINT V. MCCARTHY, 801 F.2d 1080, 1111-1112 (9th Cir. 1986)
- EMMANUEL V. LEIA, 556 F.3d at 501 n.7
- KING V. FRANK, 328 F.Supp.2d 940, 947-48 (W.D. Wis. 2000)
- WILLIAMS V. ^{BOLES} ~~BOLES~~, 841 F.2d 181, 183 (7th Cir. 1988)
- JOHNSON V. DOHERTY, 713 F.Supp. 69, 71 (S.D.N.Y. 1989)
- STANLEY V. REISCH, 745 N.W.2d 813, 817-18 (S.D. 2008)
- TOWER V. GLOVER, 467 U.S. 914, 920, 104 S.Ct. 2820 (1984)
- KOKKONEN V. GARDIAN LIFE INS. CO., 511 U.S. at 381-82
- 18 U.S.C. § 3626(c)(2)
- MCCROY V. SHEAHAN, 383 F.Supp.2d 1010, 1014 (N.D. Ill. 2005)
- WRIGHT V. BAUER, 849 F.Supp. 568, 573-74 (N.D. Ohio 1994)
- JILLEY V. COUGHLIN, 76 F.3d 468 (2nd Cir. 1996)
- HILL V. MARSHALL, 962 F.2d 1209, 1213-15 (6th Cir. 1992)
- DUNA V. WHITE, 880 F.2d 1188 (10th Cir. 1989)
- BILLMAN V. INDIANA DEPT. OF CORRECTIONS, 56 F.3d 785, 788 (7th Cir. 1995)
- LOLIE V. COUNTY OF ORANGE, 351 F.3d 410, 420-21 (9th Cir. 2003)
- *BORETTI V. WISCOMB, 930 F.2d 1150, 1155 (6th Cir. 1991)
- *CONSOLO V. GEORGE, 58 F.3d 791 (1st Cir. 1995)
- *HILL V. MARSHALL, 962 F.2d 1209, 1215 (6th Cir. 1992)
- MONTANO V. HEDGECOCK, 120 F.3d 844, 850-51 (8th Cir. 1997)
- *POLK COUNTY V. DODSON, 454 U.S. 312, 324, 102 S.Ct. 445 (1981)
- *LADY V. CORRECTIONAL MEDICAL SERVICES, 358 F.Supp.2d 57, 64 (N.D. N.Y. 2005)

7)(F) CONTINUED from Page 3

BONTKOWSKI V. JENKINS, 661 F. Supp, 576, 577 (W.D. Ill. 1987) aff'd, 860 F.2d 1082 (7th Cir 1988)

Bieberdorf V. OREGON, 243 F. Supp 2d 1145, 1164 (D. OR. 2002)

SAMPLE V. DRECKS, 885 F.2d 1099, 1112 (3d Cir. 1989)

LEVKA V. City of CHICAGO, 748 F.2d 421, 424-27 (7th Cir. 1984)

DENIUS V. DUNLAP, 330 F. 3d 919, 929 (7th Cir 2003)

ROBLES V. Prince GEORGES County, MD., 302 F.3d

MAKIN V. COLORADO DEPT. OF CONSTRUCTION, 183 F. 3d 1205, 1215 (10th Cir. 2000)

MAUL V. CONSTAN, 13 F. 3d 143 (7th Cir. 1994)

Wilcox V. City of RENO, 42 F. 3d 550, 555 (9th Cir. 1994)

Williams V. KAUFMAN County, 352 F. 3d 994, 1015 (5th Cir. 2003)

WRIGHT V. SHEPPARD, 919 F.2d 665, 671 (11th Cir. 1990)

SHERMAN V. KASOTAKES, 314 F. Supp. 2d 843, 874-75 (N.D. Iowa 2004)

WHITE V. FORD MOTOR CO., 500 F. 3d 963, 976 (9th Cir. 2007)

Kemezy V. PETERS, 79 F. 3d 33, 34-36 (7th Cir 1996)

ASWEGAN V. Bruhl, 965 F. 2d 676, 677 (8th Cir 1992)

FARRAR V. Hobby, 506 U.S. 103, 113 S. Ct. 566 (1992)

PAUL V. Gomez, 190 F.R.D. 402, 403 (W.D. VA. 2000)

FUENTES V. WAGNER, 206 F.3d 335, 341 (3rd Cir 2000)

BENJAMIN V. MALCOLM, 646 F. Supp. at 1556 n. 3

Hamilton V. Lyons, 74 F.3d 99, 106 (5th Cir 1996)

GONZALEZ V. MARTINEZ, 403 F. 3d 1179, 1186-89 (10th Cir 2005)

HELLING V. MCKINNEY, 504 U.S. 25, 33, 113 S. Ct. 2475 (1993)

BENEFIELD V. McDOWELL, 241 F.3d 1267, 1272 (10th Cir. 2001)

OUELLETTE V. MAINE STATE PRISON, 2006 WL 173639 (D. ME. Jan. 23, 2006) aff'd, 2006 WL 348315 (D. ME., FEB. 14, 2006)

STEELE V. FEDERAL BUREAU OF PRISONS, 355 F. 3d 1204, 1213 (10th Cir. 2003)

DUGAS V. JEFFERSON County, 931 F. Supp. 1315, 1319 (E.D. TX. 1996)

aff'd, 127 F.3d 33 (5th Cir 1997)

WILLIAMSON V. WILKINSON, 132 F. Supp 2d 601, 610 (S.D. OHIO 2001)

COUNT I

The following civil rights has been violated: My Eighth Amendments Civil Rights (& Possibly Fourth Amendment as well) & (Possible 14th Amendment (Prisoner Detained))

Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

County of Elko, Elko County, Sheriff Aitor Navarro, Elko County, Sheriff Office (ELSO), as well as John C. Carpenter Law Enforcement Center (SCLEC), Its Contractual Vendor Medallas Medical Care (MMC) and its Employee Dr. Rachot are Government Agencies and agents acting Under Color of Law in their Official Capacity while Performing Duties & Responsibilities Under State Law. Aforementioned Defendants Exhibited Clear Evidence of Deliberate-Indifference By Showing No Concern in Regards to my Contracting or Infecting others With Tuberculosis (TB), H.I.V., Hepatitis C or other Communicable Diseases and Despite Numerous Inmate Medical Kits as well as numerous Requests for a "Mantoux" skin test and other testing see exhibits B-1-4. Not only do their responses show a complete lack of interest in my medical well being but also violate Professional Training, Occupational Code of Conduct & Ethics. They also violate the Contract Between (MMC), (ELSO), John C. Carpenter Law Enforcement Center, and the County of Elko. The Defendants Failure to properly screen me both medically and mentally upon intake in violation for Breach of Contract and for Deliberate Indifference, Ignorance and Blatant Disregard for Policies, Contracts, Laws and Federal Grants intended to provide medical & mental health services for inmates and detainees.

Exhibit B-2

Dr. Troy Eden Sick Call Request	Elko County Sheriff's Off Jail	[REDACTED]	
<input type="checkbox"/> Dental (Dental)	<input type="checkbox"/> HIV/Aids (Sida)	<input checked="" type="checkbox"/> Medical (Medica)	<input type="checkbox"/> Psychiatric (Siquiatra)

Name (Nombre) Printed: NATHAN LAWRENCE		S.O. No. (Numero de booking): 1313302
Alias Name (Otro nombre):		Birth Date (Fecha de nacimiento) mm/dd/yy: 07/30/1971
Request Date (Fecha de hoy): 4/7/2019	Time (Hora): 2:38 PM	Location (Ubicacion):

Describe your health problem (Diganos saber su problema de salud) (Favor explicar nos su problema de salud):
 could i please get an hiv tb and hepatitis test and also diabetes as it runs in my family

How long have you had this problem? (? Cuanto tiempo ha tenido este problema ?)

This request is my permission to get psychiatric, medical or dental exams and treatment from Jail Health Staff. (Esta solicitud representa mi permiso para recibir exámenes y tratamiento siquiátrico, médica o dental de parte del personal de salubridad pública de la cárcel.)

I understand that the jail may charge me for some of these services and may deduct it from my account during this current incarceration or future stays in the jail. I will get health care even if I am unable to pay. (Entiendo que la cárcel puede cobrar por algunos de estos servicios y puede deducirlo de mi cuenta durante estas estancias actuales del encarcelamiento o del futuro en la cárcel. Conseguire cuidado medico incluso si no puedo pagar.	Signature (Firma):
	nl

[REDACTED]	
Your request has been received and you have been schedule for (Hemos recibido su pedido y tiene una cita con):	
<input checked="" type="checkbox"/> MD Clinic (Medico) <input type="checkbox"/> Nurse (La Enfermera) <input type="checkbox"/> Chart Review (Revisión de el archivo) <input type="checkbox"/> Mental Health (Siquiatra)	
Response:	
Not medically indicated at this time. Unless symptomatic.	
Reviewed By: <u>Heather.PA</u>	Date <u>4/7/2019 6:19:19 PM</u>

NOTES:

Staff:	Date: 4/27/2019	Time: 6:40 PM
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INMATE REQUEST FORM

NAME (Nombre): NATHAN LAWRENCE DATE (Fecha): 5/10/2019

SO No. (Numero de booking): 1313302 CELL (Ubicacion): lblock

REQUEST (Solicitud):

could i please get a tb shot i think i was supposed to get one when i was booked or during the intake process
thank u

REPLY:

THIS IS NOT A KITE THIS IS A MEDICAL KITE YOU NEED TO PUT IN A MEDICAL KITE AND SEE IF THE DOCTOR WILL DO IT

DATE 5/12/2019

TIME: 12:57 AM

DEPUTY: SGT. ADKINS

Submitted by Email

Exhibit B-3

Dr. Troy Eden Sick Call Request	Elko County Sheriff's Off Jail	
<input type="checkbox"/> Dental (Dental)	<input type="checkbox"/> HIV/Aids (Sida)	<input checked="" type="checkbox"/> Medical (Medica)
<input type="checkbox"/> Psychiatric (Siquiatra)		

Name (Nombre) Printed: NATHAN LAWRENCE	S.O. No. (Numero de booking): 1313302
Alias Name (Otro nombre):	Birth Date (Fecha de nacimiento) mm/dd/yy: 07/30/1971
Request Date (Fecha de hoy): 5/10/2019	Time (Hora): 11:29 AM
Location (Ubicacion): Iblock	

Describe your health problem (Diganos saber su problema de salud) (Favor explicar nos su problema de salud):
 i would like a tb test please i think i was supposed to be tested when i came into jail thank u

How long have you had this problem? (? Cuanto tempo ha tenido este problema ?)

This request is my permission to get psychiatric, medical or dental exams and treatment from Jail Health Staff. (Esta solicitud representa mi permiso para recibir exámenes y tratamiento siquiatrico, medica o dental de parte del personal de salubridad publica de la carcel.)

<p>I understand that the jail may charge me for some of these services and may deduct it from my account during this current incarceration or future stays in the jail. I will get health care even if I am unable to pay. (Entiendo que la carcel puede cobrar pro algunos de estos servicios y puede deducirlo de mi cuenta durante estas estancias actuales del encarcelamiento o del futuro en la carcel. Conseguire cuidado medico incluso si no puedo pagar.</p>	<p>Signature (Firma):</p> <p>nathan lawrence: (nl)</p>
--	--

Your request has been received and you have been schedule for (Hemos recibido su pedido y tiene una cita con):

MD Clinic (Medico) Nurse (La Enfermera) Chart Review (Revision de el archivo) Mental Health (Siquiatra)

Response:

We do not do preventative care here.

Reviewed By: Dr. Rachot Date 5/10/2019 11:59:57 AM

NOTES:

Staff:	Date: 5/17/2019	Time: 1:27 AM
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Elko County Sheriff's Office PRISONER GRIEVANCE FORM # 5615

Prisoner Name: LAWRENCE NATHAN SO#: 1313302 Date: 5/14/2019
Last First Middle
Housing Unit#: Iblock Elko County Sheriff's Office

Instructions: Follow the direction for filling a Prisoner Grievance found on page of the Prisoner Information Manual. Failure to process the grievance as directed in the manual will result in your grievance being dismissed. (If you need more room, use the additional sheets of paper)

Grievance:
that i wasnt given a tb shot

Prisoner's Signature: nathan lawrence Date/Time: 5/14/2019 1:10:14 PM
Receiving Officer Signature: Lt Silva Date/Time: 5/17/2019 9:38:02 AM
Officer's Response:
TB shots are not offered at the facility.

Officer's Signature: Lt. Silva Date/Time: 5/17/2019 9:38:02 AM
Prisoner's Signature: Accept Officer's Resolution: [] Date/Time:
Request Review by Supervisor: nathan lawrence Date/Time: 5/17/2019 2:20:55 PM
Supervisor Review:
WE DO NOT DO TB SHOTS

Supervisor's Signature: SGT. ADKINS Date/Time: 5/18/2019 3:42:35 AM
Review at Request of Prisoner: Yes Or by Policy: Date/Time: 5/17/2019 2:20:55 PM
Prisoner's Signature: Accepting Supervisor Resolution: [] Date/Time:
Appeal Process:
I wish to appeal this grievance to the Jail Commander or his designee:
Prisoner's Signature: nathan lawrence (nl) Date/Time: 5/18/2019 5:29:11 PM
Jail Commander's Response:
TB shots are not offered at the facility.

Jail Commander's Signature: Lt. Silva Date/Time: 5/20/2019 8:09:18 AM

Upon submitting, give back copy to Prisoner/Upon Resolution give next copy to Prisoner/Original copy to Admin Sargent for tracking and disbursement.

I wish to appeal the Jail Commanders response to my grievance. I realized that the Sheriff's decision is final.
Prisoner's Signature: nathan lawrence (nl) Date/Time: 5/20/2019 12:37:54 PM
Sheriff's Response:
TB shots are not offered at the facility

Sheriff's Signature: J Carpenter Date/Time: 5/21/2019 11:45:17 AM

I acknowledge that I have received the final answer to my grievance.
Prisoner's Signature: nathan lawrence (nl) Date/Time: 5/21/2019 5:10:46 PM

COUNT II

The following civil rights has been violated: My Eighth Amendment Civil Rights, & (Possibly Fourteenth Amendment as a Pretrial Detainee) (Possibly Fourth amend as well)

Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

Elko County, Elko County Sheriff Aitor Narvango, Elko County Sheriff office (ECSO), John C. Carpenter Law Enforcement Center (JCLEC) all acting Under Color of Law through the Implementation and appointment of Lt. Mike Silva (Chief of Police) (ECSO) are Operating and participating in a System wherein I cannot make an anonymous P.R.E.A. Report or Confidential P.R.E.A. Claim Without another officer or Sgt. seeing it, Despite several Kites, Medical Requests through Mental Health and multiple Grievances see exhibits (C) 1-11. Lt. Silva acting as P.R.E.A. Coordinator while also overseeing Deputies in trying to Report is a clear Conflict of Interest and in Direct Violation of Policies, Procedures and even Federal Grants. To Date I still have been unable to Report the Violation and have not receive any kind of Merit or Validation. The P.R.E.A. button on kiosk doesn't work and Sgt actions as well as Lt. Silvas Responses to Kites and Grievances to "slide a Note Under the door" or "write a Note and Don't Sign it" provide no solution to anyone and are in Violation of Federal P.R.E.A. Grants and Policies as well as those held by (ECSO) and (JCLEC).

Elko County Sheriff's Office PRISONER GRIEVANCE FORM # 5628

Prisoner Name: LAWRENCE NATHAN SO#: 1313302 Date: 5/15/2019
Last First Middle
Housing Unit#: Iblock 202 Elko County Sheriff's Office

Instructions: Follow the direction for filling a Prisoner Grievance found on page of the Prisoner Information Manual. Failure to process the grievance as directed in the manual will result in your grievance being dismissed. (If you need more room, use the additional sheets of paper)

Grievance: that there is no way for me to report a "P.R.E.A." report anonymously, any attempt made through medical is sent back to inmate and instructed to talk to Lt. Silva even if psychiatric box checked and requesting to speak to mental health dr., i cannot report from kiosk or phone anonymously due to having to log in using sheriffs inmate number. is it policy to have LT. who oversees deputies (being reported) or ordering strip search to also be acting as "P.R.E.A." coordinator???? (conflict??)

Prisoner's Signature: nathan lawrence (nl) Date/Time: 5/15/2019 11:23:19 AM

Receiving Officer Signature: Lt. Silva Date/Time: 5/17/2019 9:35:53 AM

Officer's Response: You can write a letter and not sign it.

Officer's Signature: Lt. Silva Date/Time: 5/17/2019 9:35:53 AM

Prisoner's Signature: Accept Officer's Resolution: [] Date/Time:

Request Review by Supervisor: nathan lawrence Date/Time: 5/17/2019 2:24:38 PM

Supervisor Review: YOU CAN WRITE A LETTER AND NOT SIGN IT THAT WAY IT WILL BE ANONYMOUS

Supervisor's Signature: SGT. ADKINS Date/Time: 5/18/2019 3:39:22 AM

Review at Request of Prisoner: Yes Or by Policy: Date/Time: 5/17/2019 2:24:38 PM

Prisoner's Signature: Accepting Supervisor Resolution: [] Date/Time:

Appeal Process: I wish to appeal this grievance to the Jail Commander or his designee: Prisoner's Signature: nathan lawrence (nl) Date/Time: 5/18/2019 5:28:11 PM

Jail Commander's Response: You can write a letter and not sign it.

Jail Commander's Signature: Lt. Silva Date/Time: 5/20/2019 8:07:53 AM

Upon submitting, give back copy to Prisoner/Upon Resolution give next copy to Prisoner/Original copy to Admin Sargent for tracking and disbursement.

I wish to appeal the Jail Commanders response to my grievance. I realized that the Sheriff's decision is final.

Prisoner's Signature: nathan lawrence (nl) Date/Time: 5/20/2019 12:41:24 PM

Sheriff's Response: Send a letter out to the Detectives without signing it.

Sheriff's Signature: J Carpenter Date/Time: 5/21/2019 11:43:00 AM

I acknowledge that I have received the final answer to my grievance. Prisoner's Signature: nathan lawrence (nl) Date/Time: 5/21/2019 5:12:15 PM

Elko County Sheriff's Office PRISONER GRIEVANCE FORM # 5470

Prisoner Name: LAWRENCE NATHAN SO#: Date: 5/5/2019
Last First Middle
Housing Unit#: Elko County Sheriff's Office

Instructions: Follow the direction for filling a Prisoner Grievance found on page of the Prisoner Information Manual. Failure to process the grievance as directed in the manual will result in your grievance being dismissed. (If you need more room, use the additional sheets of paper)

Grievance: sgt.adkins responded to grievance #5422 in which i requested to speak with the prea coordinator about an issue i have concerning a strip search looking for a "METAL PLATE OUTLET COVER" missing from cell #101 in Iblock . he responded with a "SAFETY AND SECURITY OF INMATES AND STAFF" response never addressing issue of prea.. i will adress prea in subsaquent grievance .. lets address some safety and security questions of my own which pertain to same search.. #1 when is last documented time missing metal plate

Prisoner's Signature: nl Date/Time: 5/5/2019 4:43:08 PM

Receiving Officer Signature: SGT. ADKINS Date/Time: 5/5/2019 7:01:23 PM

Officer's Response: I WILL PASS THIS ON TO THE LT. I BELIEVE SINCE OUR PREA COORINATOR RETIRED I BELIEVE THAT IT IS NOW LT. SILVA

Officer's Signature: SGT. ADKINS Date/Time: 5/5/2019 7:01:23 PM

Prisoner's Signature: Accept Officer's Resolution: [] Date/Time:

Request Review by Supervisor: nl Date/Time: 5/5/2019 9:01:22 PM

Supervisor Review: This is not a grievance. The safety and security of the inmates, staff, and facility are priority. It is know that inmates hide contraband on their person. Expectation of privacy is lost while incarcerated, also.

Supervisor's Signature: Lt. Silva Date/Time: 5/9/2019 8:04:28 AM

Review at Request of Prisoner: Yes Or by Policy: Date/Time: 5/5/2019 9:01:22 PM

Prisoner's Signature: Accepting Supervisor Resolution: [] Date/Time:

Appeal Process: I wish to appeal this grievance to the Jail Commander or his designee:

Prisoner's Signature: nathan lawrence (nl) Date/Time: 5/9/2019 11:10:09 AM

Jail Commander's Response: This is not a grievance. The safety and security of the inmates, staff, and facility are priority. It is know that inmates hide contraband on their person. Expectation of privacy is lost while incarcerated, also.

Jail Commander's Signature: Lt. Silva Date/Time: 5/9/2019 12:29:45 PM

Upon submitting, give back copy to Prisoner/Upon Resolution give next copy to Prisoner/Original copy to Admin Sargent for tracking and disbursement.

I wish to appeal the Jail Commanders response to my grievance. I realized that the Sheriff's decision is final.

Prisoner's Signature: nathan lawrence (nl) Date/Time: 5/9/2019 12:50:48 PM

Sheriff's Response: Safety and Security of inmates, staff and the facility are the priority. Your grievance has been forwarded to the Elko County Attorney

Sheriff's Signature: J Carpenter Date/Time: 5/20/2019 11:09:54 AM

I acknowledge that I have received the final answer to my grievance. Prisoner's Signature: nathan lawrence (nl) Date/Time: 5/20/2019 12:35:18 PM

Elko County Sheriff's Office PRISONER GRIEVANCE FORM # 5422

Prisoner Name: LAWRENCE NATHAN SO#: 1313302 Date: 5/2/2019
Last First Middle
Housing Unit#: Iblock Elko County Sheriff's Office

Instructions: Follow the direction for filling a Prisoner Grievance found on page of the Prisoner Information Manual. Failure to process the grievance as directed in the manual will result in your grievance being dismissed. (If you need more room, use the additional sheets of paper)

Grievance:

i am grieving the issue that i was made to strip naked after a shakedown of cells and dayroom of Iblock. having to remove my boxers and bend over to cough three times , expose my genitals and penis after walking through a metal detector and it flashing green clearing me of any foriegn metal objects "metal outlet plate cover" which was reason given for "shakedown" has left me feeling violated and i would like to speak with the PREA coordinator asap thank you for your help in this matter, i would ask u to review the deputies body cams that

Prisoner's Signature: nl Date/Time: 5/2/2019 1:58:26 PM

Receiving Officer Signature: SGT. ADKINS Date/Time: 5/2/2019 7:35:41 PM

Officer's Response:

IT IS OUR POLICY TO STRIP SEARCH ANYBODY THAT COMES INTO THIS JAIL AND IF YCU ARE DOING A CELL SEARCH WE CAN STRIP SEARCH FOR OUR SAFTEY OF THE DEPUTIES AND OTHER INMATES AND THE JAIL

Officer's Signature: SGT. ADKINS Date/Time: 5/2/2019 7:35:41 PM

Prisoner's Signature: Accept Officer's Resolution: [] Date/Time:

Request Review by Supervisor: nl Date/Time: 5/3/2019 10:57:00 AM

Supervisor Review:

WE CAN STRIP SEARCH ANYBODY IN THE JAIL FOR THE SAFETY OF OTHER INMATES, DEPUTIES, AND THE SAFETY OF THE JAIL

Supervisor's Signature: SGT. ADKINS Date/Time: 5/5/2019 7:43:52 PM

Review at Request of Prisoner: Yes Or by Policy: Date/Time: 5/3/2019 10:57:00 AM

Prisoner's Signature: Accepting Supervisor Resolution: [] Date/Time:

Appeal Process:

I wish to appeal this grievance to the Jail Commander or his designee:

Prisoner's Signature: nl Date/Time: 5/5/2019 9:01:13 PM

Jail Commander's Response:

The safety and security for inmates, staff, and the facility were at risk. The expectation of privacy is no longer, while you are in custody. This is not a PREA issue as it ensures that inmates, staff, and the facility are safe and secure.

Jail Commander's Signature: Lt. Silva Date/Time: 5/8/2019 12:42:36 PM

Upon submitting, give back copy to Prisoner/Upon Resolution give next copy to Prisoner/Original copy to Admin Sargent for tracking and disbursement.

I wish to appeal the Jail Commanders response to my grievance. I realized that the Sheriff's decision is final.

Prisoner's Signature: nathan lawrence (nl) Date/Time: 5/8/2019 1:08:26 PM

Sheriff's Response:

Safety and security of inmates, staff and the facility is priority, The expectation of privacy in no longer while in custody. PREA relates to sexual assault, this is not a PREA violation

Sheriff's Signature: J Carpenter Date/Time: 5/20/2019 11:51:26 AM

I acknowledge that I have received the final answer to my grievance.

Prisoner's Signature: Date/Time:

Elko County Sheriff's Office PRISONER GRIEVANCE FORM # 5511

Prisoner Name: LAWRENCE NATHAN SO#: Date: 5/9/2019
Last First Middle
Housing Unit#: Elko County Sheriff's Office

Instructions: Follow the direction for filling a Prisoner Grievance found on page of the Prisoner Information Manual. Failure to process the grievance as directed in the manual will result in your grievance being dismissed. (If you need more room, use the additional sheets of paper)

Grievance:

im grieving the issue of being forced to swtrip naked (P.R.E.A. viol.?) bend at the waist spread buttcheeks and cough as well as lift scrodam and penis under pretext of safety and security in search of "metal plate outlet cover. (body searches must be reasonable,deciding what is reasonable requires the balancing of the need for particular search against the invasion of the rights the search entails) having passed through mthe hallway metal detector twice and being in direct line of site of four deputies is it reasonable to believe i have somehow

Prisoner's Signature: nathan lawrence (nl) Date/Time: 5/9/2019 1:18:05 PM
Receiving Officer Signature: SGT. ADKINS Date/Time: 5/12/2019 11:14:36 PM

Officer's Response:
THIS IS NOT A PREA ISSUE

Officer's Signature: SGT. ADKINS Date/Time: 5/12/2019 11:14:36 PM

Prisoner's Signature: Accept Officer's Resolution: [] Date/Time:

Request Review by Supervisor: nathan lawrence (nl) Date/Time: 5/13/2019 1:46:23 PM

Supervisor Review:

For the safety and security of inmates, staff, and the facility strip searches are part of the process. This does not apply to PREA. PREA is associated with sexual assaults, you were not sexually assaulted, staff were conducting a search for contraband that could be a danger to inmates and staff.

Supervisor's Signature: Lt. Silva Date/Time: 5/14/2019 8:21:54 AM

Review at Request of Prisoner: Yes Or by Policy: Date/Time: 5/13/2019 1:46:23 PM

Prisoner's Signature: Accepting Supervisor Resolution: [] Date/Time:

Appeal Process:

I wish to appeal this grievance to the Jail Commander or his designee:

Prisoner's Signature: nathan lawrence Date/Time: 5/14/2019 1:11:47 PM

Jail Commander's Response:

For the safety and security of inmates, staff, and the facility strip searches are part of the process. This does not apply to PREA. PREA is associated with sexual assaults, you were not sexually assaulted, staff were conducting a search for contraband that could be a danger to inmates and staff.

Jail Commander's Signature: Lt Silva Date/Time: 5/14/2019 1:56:00 PM

Upon submitting, give back copy to Prisoner/Upon Resolution give next copy to Prisoner/Original copy to Admin Sargent for tracking and disbursement.

I wish to appeal the Jail Commanders response to my grievance. I realized that the Sheriff's decision is final.

Prisoner's Signature: nathan lawrence (nl) Date/Time: 5/14/2019 3:11:22 PM

Sheriff's Response:

This was done for the safety and security of the facility, staff and inmates as part of the process. This is not a PREA issue, PREA is related to sexual assault, you were not sexually assaulted staff was conducting a search for contraband that could have been a danger to everybody.

Sheriff's Signature: J Carpenter Date/Time: 5/20/2019 11:04:39 AM

I acknowledge that I have received the final answer to my grievance.

Prisoner's Signature: nathan lawrence (nl) Date/Time: 5/20/2019 12:37:11 PM

INMATE REQUEST FORM

NAME (Nombre): NATHAN LAWRENCE DATE (Fecha): 5/19/2019

SO No. (Numero de booking): 1313302 CELL (Ubicacion): Iblock202

REQUEST (Solicitud):

is there any way to report a "P.R.E.A." incident against a deputy where it can remain confidential/anonymous and not be seen, screened, viewed, discussed or responded too by another dep., sgt., Lt. ????? ive tried through med./mental health and been denied and told to talk to Lt. which defeats my confidentiality/anonymous reasons.

REPLY:

WRITE A LETTER AND PUT IT UNDER THE DOOR AND DO NOT SIGN IT

DATE 5/19/2019

TIME: 9:08 PM

DEPUTY: SGT. ADKINS

INMATE REQUEST FORM

NAME (Nombre): NATHAN LAWRENCE DATE (Fecha): 5/14/2019

SO No. (Numero de booking): 1313302 CELL (Ubicacion): lblock

REQUEST (Solicitud):

does the jail/sheriffs dept./john carpenter law complex/center follow P.R.E.A. guidelines and regulations?

REPLY:

YES

DATE 5/17/2019 TIME: 1:31 AM DEPUTY: SGT. ADKINS

INMATE REQUEST FORM

NAME (Nombre): NATHAN LAWRENCE DATE (Fecha): 5/3/2019

SO No. (Numero de booking): 1313302 CELL (Ubicacion): Iblock

REQUEST (Solicitud):

i would like to speak with the "PREA" coordinator its an emergency please and thank u for your help in this matter.

REPLY:

I WILL COME TALK TO YOU TONIGHT

DATE 5/3/2019

TIME: 8:06 PM

DEPUTY: SGT. ADKINS

INMATE REQUEST FORM

NAME (Nombre): NATHAN LAWRENCE DATE (Fecha): 5/4/2019

SO No. (Numero de booking): 1313302 CELL (Ubicacion): lblock

REQUEST (Solicitud):

sgt. adkins responded to my request to speak to the prea coordinator and said he would come speak with me, am i to understand that he is person handling prea issues here at the jail? if he isnt could i please speak to whom ever is my contact here at the jail. thank you for your time and please help me fix this

REPLY:

I WAS GOING TO TALK TO YOU BUT THE PREA COORDINATOR IS LT. SILVA

DATE 5/4/2019

TIME: 7:41 PM

DEPUTY: SGT. ADKINS

Dr. Troy Eden	Elko County Sheriff's Off		
Sick Call Request	Jail		
<input type="checkbox"/> Dental (Dental)	<input type="checkbox"/> HIV/Aids (Sida)	<input type="checkbox"/> Medical (Medica)	<input checked="" type="checkbox"/> Psychiatric (Siquiatra)

Name (Nombre) Printed: NATHAN LAWRENCE		S.O. No. (Numero de booking): 1313302
Alias Name (Otro nombre):		Birth Date (Fecha de nacimiento) mm/dd/yy: 07/30/1971
Request Date (Fecha de hoy): 5/7/2019	Time (Hora): 11:15 AM	Location (Ubicacion): Iblock

Describe your health problem (Diganos saber su problema de salud) (Favor explicar nos su problema de salud):
i would like to speak with "P.R.E.A." coordnator

How long have you had this problem? (? Cuanto tempo ha tenido este problema ?)

This request is my permission to get psychiatric, medical or dental exams and treatment from Jail Health Staff. (Esta solicitud representa mi permiso para recibir exámenes y tratamiento siquiátrico, médica o dental de parte del personal de salubridad pública de la cárcel.)

I understand that the jail may charge me for some of these services and may deduct it from my account during this current incarceration or future stays in the jail. I will get health care even if I am unable to pay. (Entiendo que la cárcel puede cobrar pro algunos de estos servicios y puede deducirlo de mi cuenta durante estas estancias actuales del encarcelamiento o del futuro en la cárcel. Conseguire cuidado medico incluso si no puedo pagar.	Signature (Firma):
	nathan lawrence: (nl)

Your request has been received and you have been schedule for (Hemos recibido su pedido y tiene una cita con):

MD Clinic (Medico) Nurse (La Enfermera) Chart Review (Revisión de el archivo) Mental Health (Siquiatra)

Response:

This is not medical.

Reviewed By: Dr. Rachot Date 5/7/2019 1:35:10 PM

NOTES:

Staff:	Date: 5/17/2019	Time: 1:25 AM
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Exhibit C-10

Dr. Troy Eden	Elko County Sheriff's Off	
Sick Call Request	Jail	
<input type="checkbox"/> Dental (<i>Dental</i>)	<input type="checkbox"/> HIV/Aids (<i>Sida</i>)	<input type="checkbox"/> Medical (<i>Medica</i>)
<input checked="" type="checkbox"/> Psychiatric (<i>Siquiatra</i>)		

Name (<i>Nombre</i>) Printed: NATHAN LAWRENCE		S.O. No. (<i>Numero de booking</i>): 1313302
Alias Name (<i>Otro nombre</i>):		Birth Date (<i>Fecha de nacimiento</i>) mm/dd/yy: 07/30/1971
Request Date (<i>Fecha de hoy</i>): 5/8/2019	Time (<i>Hora</i>): 12:42 PM	Location (<i>Ubicacion</i>): Iblock

Describe your health problem (*Diganos saber su problema de salud*) (*Favor explicar nos su problema de salud*):
 i would like to speak with dr. about "P.R.E.A." issue is this where i request to do so? im concerned about jail staff learning of my issue and being retaliated against. so please help me speak to mental health or direct me to where i might file an anonymous report. thank you ,again please help as its causing health issues ... thanks

How long have you had this problem? (*? Cuanto tempo ha tenido este problema ?*)

This request is my permission to get psychiatric, medical or dental exams and treatment from Jail Health Staff. (*Esta solicitud representa mi permiso para recibir exámenes y tratamiento siquiatico, medica o dental de parte del personal de salubridad publica de la carcel.*)

I understand that the jail may charge me for some of these services and may deduct it from my account during this current incarceration or future stays in the jail. I will get health care even if I am unable to pay. (*Entiendo que la carcel puede cobrar pro algunos de estos servicios y puede deducirlo de mi cuenta durante estas estancias actuales del encarcelamiento o del futuro en la carcel. Conseguire cuidado medico incluso si no puedo pagar.*)

Signature (*Firma*):

nathan lawrence: (nl)

Your request has been received and you have been schedule for (*Hemos recibido su pedido y tiene una cita con*):

MD Clinic (*Medico*) Nurse (*La Enfermera*) Chart Review (*Revisión de el archivo*) Mental Health (*Siquiatra*)

Response:

Not our department take up with LT

Reviewed By: Dr.Rachot Date 5/8/2019 7:38:53 PM

NOTES:

Staff: _____ Date: 5/17/2019 Time: 1:26 AM

Dr. Troy Eden Sick Call Request	Elko County Sheriff's Off Jail	
<input type="checkbox"/> Dental (Dental)	<input type="checkbox"/> HIV/Aids (Sida)	<input type="checkbox"/> Medical (Medica) <input checked="" type="checkbox"/> Psychiatric (Siquiatra)

Name (Nombre) Printed: NATHAN LAWRENCE	S.O. No. (Numero de booking): 1313302
Alias Name (Otro nombre):	Birth Date (Fecha de nacimiento) mm/dd/yy: 07/30/1971
Request Date (Fecha de hoy): 5/10/2019	Time (Hora): 11:39 AM
	Location (Ubicacion): Iblock

Describe your health problem (Diganos saber su problema de salud) (Favor explicar nos su problema de salud):
 due to incident where i was stripped naked (P.R.E.A. violation) i havnt been sleeping well ,my anxiety is growing,im fearfull of my safety or retaliation from jail staff i would like to talk to mental health or someone anonymously please i also think i am losing weight or developing ulcers over worrying and stressing please help again im worried about my safety and retaliation from sheriffs office employees and would like to speak.
How long have you had this problem? (? Cuanto tiempo ha tenido este problema ?)

This request is my permission to get psychiatric, medical or dental exams and treatment from Jail Health Staff. (Esta solicitud representa mi permiso para recibir exámenes y tratamiento siquiátrico, médica o dental de parte del personal de salubridad pública de la cárcel.)	
I understand that the jail may charge me for some of these services and may deduct it from my account during this current incarceration or future stays in the jail. I will get health care even if I am unable to pay. (Entiendo que la cárcel puede cobrar pro algunos de estos servicios y puede deducirlo de mi cuenta durante estas estancias actuales del encarcelamiento o del futuro en la cárcel. Conseguire cuidado medico incluso si no puedo pagar.	Signature (Firma): nathan lawrence(nl)

Your request has been received and you have been schedule for (Hemos recibido su pedido y tiene una cita con):	
<input checked="" type="checkbox"/> MD Clinic (Medico) <input type="checkbox"/> Nurse (La Enfermera) <input type="checkbox"/> Chart Review (Revisión de el archivo) <input type="checkbox"/> Mental Health (Siquiatra)	
Response: There Is nothing that I can do in regards to PREA. I will put you on omeprazole 20 mg starting tonight to help with your ulcers you think you are developing. I will schedule you with our mental health provider to discuss your anxiety. But again you need to take up the prea incidents and concerns with jail staff.	
Reviewed By: <u>Dr.Rachot</u>	Date: <u>5/11/2019 5:48:55 PM</u>

NOTES:

Staff:	Date: 5/17/2019	Time: 1:27 AM
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COUNT III

The following civil rights has been violated: My Eighth Amendments Civil Rights & (Possibly, Fourteenth Amendment as Well Being a Pretrial Detainee)

Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

Elko County, Elko County Sheriff Aita Nawaya, Elko County Sheriff's Office (EC SO), John C. Carpenter Law Enforcement Center (JCCLEC), Medallus Medical Care (MMC) Dr. Pachot are all Government agencies and agents acting Under Color of Law in the Performance of their Responsibilities and Duties. Within this Complaint (Count III) I am alleging that (MMC) and Dr. Pachot are in Breach of Contract of which I am the third Party Beneficiary, MMC Being the Contractual Vendor Delegated to Provide Medical & Mental Health Products & services here at the JCCLEC. Wecker Due to Ignorance, Poor Training or Deliberate Indifference to the Health and Well Being of Arrestees/Detainees, MMC and Doctor Pachot's Refusal to Test me (either at intake or currently) For Communicable Diseases including TB, HIV, HepC, MRSA ETC. IS Not only Unconstitutional but in Violation of Policies Grant Occupational Oaths Between Elko County, the Sheriff (AN) the EC SO & JCCLEC. the Illegal housing of myself and others and the Reprehensible Behavior in Regards to Level of Care Provided Have Contributed to me Experiencing Mental Anguish.

D. PREVIOUS LAWSUITS AND ADMINISTRATIVE RELIEF

- 1) Have you filed other actions in state or federal courts involving the same or similar facts as involved in this action? ___ Yes No. If your answer is "Yes", describe each lawsuit. (If more than one, describe the others on an additional page following the below

Continued from Page 6 Count III

Ulcers (being Prescribed Medication), Misery, Cramping (abdominal), Migraine Headaches etc. Due to Fact of Being Rejected From JCCLEC and Transported to Hospital (Until Cleared) Upon Return to JCCLEC I was Never Cleared Medically or By Mental Health, After several Requests was Seen ~~by~~ By Mental Health and Diagnosed with "Meth Induced Psychosis" and Prescribed Meds (Serquil & Buspar) the Negligence shown, Lack of Training, and Deliberate Indifference (See Exhibits) (D1-4) Shown By MMC, Dr Rachot, Sheriff's agents ELSO and JCCLEC and all in Violation of Contracts, grants, Policies, Procedures, Leases etc. Whether acting Jointly, in an Effort to Save Money or Separately, Clearly Violating My Civil Rights, and Constitutional Rights.

INMATE REQUEST FORM

NAME (Nombre): NATHAN LAWRENCE DATE (Fecha): 5/19/2019

SO No. (Numero de booking): 1313302 CELL (Ubicacion): Iblock202

REQUEST (Solicitud):

i would like to know why there is a limit on kites? including medical... i reached this limit before weeks end and had a medical issue i asked sgt.adkins what ishould do and he said talk to nurse at med pass , which i did and was told to put in a kite... which i could not do... am i somehow supposed to prioritise,forsee,or limit medical issues????

REPLY:

CAUSE ALL YOU GUYS PUT TOO MANY IN AND THEN YOU ARE TIEING UP A DEPUTY ANSWERING KITES ALL NIGHT.

DATE 5/19/2019 TIME: 9:09 PM DEPUTY: SGT. ADKINS

Exhibit D-2

Dr. Troy Eden	Elko County Sheriff's Off		
Sick Call Request	Jail		
<input type="checkbox"/> Dental (<i>Dental</i>)	<input type="checkbox"/> HIV/Aids (<i>Sida</i>)	<input type="checkbox"/> Medical (<i>Medica</i>)	<input checked="" type="checkbox"/> Psychiatric (<i>Siquiatra</i>)

Name (<i>Nombre</i>) Printed: NATHAN LAWRENCE		S.O. No. (<i>Numero de booking</i>): 1313302
Alias Name (<i>Otro nombre</i>):		Birth Date (<i>Fecha de nacimiento</i>) mm/dd/yy: 07/30/1971
Request Date (<i>Fecha de hoy</i>): 5/7/2019	Time (<i>Hora</i>): 6:24 PM	Location (<i>Ubicacion</i>): Iblock

Describe your health problem (*Diganos saber su problema de salud*) (*Favor explicar nos su problema de salud*):
i am trying to speak with "PREA" coordintor through mental health please help

How long have you had this problem? (*? Cuanto tempo ha tenido este problema ?*)

This request is my permission to get psychiatric, medical or dental exams and treatment from Jail Health Staff. (*Esta solicitud representa mi permiso para recibir exámenes y tratamiento siquiatico, medica o dental de parte del personal de salubridad publica de la carcel.*)

<p>I understand that the jail may charge me for some of these services and may deduct it from my account during this current incarceration or future stays in the jail. I will get health care even if I am unable to pay. (<i>Entiendo que la carcel puede cobrar pro algunos de estos servicios y puede deducirlo de mi cuenta durante estas estancias actuales del encarcelamiento o del futuro en la carcel. Conseguire cuidado medico incluso si no puedo pagar.</i>)</p>	Signature (<i>Firma</i>): nathan lawrence (nl)
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Your request has been received and you have been schedule for (*Hemos recibido su pedido y tiene una cita con*):

MD Clinic (*Medico*) Nurse (*La Enfermera*) Chart Review (*Revisión de el archivo*) Mental Health (*Siquiatra*)

Response:

I'm so sorry Mr. Lawrence but I don't know what PREA is. I can try to help to the best of my ability but I need to know what is going on so I know how to proceed.

Reviewed By: Rebecca Stevens, PA-C Date 5/7/2019 6:56:49 PM

NOTES:

Staff:	Date: 5/25/2019	Time: 2:49 AM
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Exhibit D-3

Elko County Sheriff's Office PRISONER GRIEVANCE FORM # 5616

Prisoner Name: LAWRENCE NATHAN SO#: 1313302 Date: 5/14/2019
Last First Middle
Housing Unit#: Iblock Elko County Sheriff's Office

Instructions: Follow the direction for filling a Prisoner Grievance found on page of the Prisoner Information Manual. Failure to process the grievance as directed in the manual will result in your grievance being dismissed. (If you need more room, use the additional sheets of paper)

Grievance:
that i wasnt given a tb shot

Prisoner's Signature: nathan lawrence Date/Time: 5/14/2019 1:10:28 PM
Receiving Officer Signature: Lt. Silva Date/Time: 5/17/2019 9:37:18 AM
Officer's Response:
TB shots are not offered at the facility.

Officer's Signature: Lt. Silva Date/Time: 5/17/2019 9:37:18 AM
Prisoner's Signature: Accept Officer's Resolution: [] Date/Time:
Request Review by Supervisor: nathan lawrence Date/Time: 5/17/2019 2:21:55 PM
Supervisor Review:
WE DO NOT DO TB SHOTS

Supervisor's Signature: SGT. ADKINS Date/Time: 5/18/2019 3:41:49 AM
Review at Request of Prisoner: Yes Or by Policy: Date/Time: 5/17/2019 2:21:55 PM
Prisoner's Signature: Accepting Supervisor Resolution: [] Date/Time:
Appeal Process:
I wish to appeal this grievance to the Jail Commander or his designee:
Prisoner's Signature: nathan lawrence (nl) Date/Time: 5/18/2019 5:28:49 PM
Jail Commander's Response:
TB shots are not offered at the facility.

Jail Commander's Signature: Lt. Silva Date/Time: 5/20/2019 8:08:47 AM
Upon submitting, give back copy to Prisoner/Upon Resolution give next copy to Prisoner/Original copy to Admin Sargent for tracking and disbursement.

I wish to appeal the Jail Commanders response to my grievance. I realized that the Sheriff's decision is final.
Prisoner's Signature: nathan lawrence (nl) Date/Time: 5/20/2019 12:38:14 PM
Sheriff's Response:
TB Shots are not offered at the Facility.

Sheriff's Signature: J Carpenter Date/Time: 5/21/2019 11:44:21 AM

I acknowledge that I have received the final answer to my grievance.
Prisoner's Signature: nathan lawrence (nl) Date/Time: 5/21/2019 5:12:47 PM

Exhibit D-4

Dr. Troy Eden Sick Call Request	Elko County Sheriff's Off Jail	
<input type="checkbox"/> Dental (Dental)	<input type="checkbox"/> HIV/Aids (Sida)	<input checked="" type="checkbox"/> Medical (Medica)
		<input type="checkbox"/> Psychiatric (Siquiatra)

Name (Nombre) Printed: NATHAN LAWRENCE		S.O. No. (Numero de booking): 1313302
Alias Name (Otro nombre):		Birth Date (Fecha de nacimiento) mm/dd/yy: 07/30/1971
Request Date (Fecha de hoy): 4/7/2019	Time (Hora): 2:38 PM	Location (Ubicacion):
Describe your health problem (Digamos saber su problema de salud) (Favor explicar nos su problema de salud): could i please get an hiv tb and hepatitis test and also diabetes as it runs in my family		
How long have you had this problem? (? Cuanto tempo ha tenido este problema ?)		
This request is my permission to get psychiatric, medical or dental exams and treatment from Jail Health Staff. (Esta solicitud representa mi permiso para recibir exámenes y tratamiento siquiatrico, medica o dental de parte del personal de salubridad publica de la carcel.)		
I understand that the jail may charge me for some of these services and may deduct it from my account during this current incarceration or future stays in the jail. I will get health care even if I am unable to pay. (Entiendo que la carcel puede cobrar pro algunos de estos servicios y puede deducirlo de mi cuenta durante estas estancias actuales del encarcelamiento o del futuro en la carcel. Conseguire cuidado medico incluso si no puedo pagar.		Signature (Firma): nl

Your request has been received and you have been schedule for (Hemos recibido su pedido y tiene una cita con):	
<input checked="" type="checkbox"/> MD Clinic (Medico) <input type="checkbox"/> Nurse (La Enfermera) <input type="checkbox"/> Chart Review (Revison de el archivo) <input type="checkbox"/> Mental Health (Siquiatra)	
Response: Not medically indicated at this time. Unless symptomatic.	
Reviewed By: <u>Heather.PA</u>	Date <u>4/7/2019 6:19:19 PM</u>

NOTES:

Staff:	Date: 4/28/2019	Time: 6:53 PM
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outline).

- a) Defendants: _____
- b) Name of court and docket number: _____
- c) Disposition (for example, was the case dismissed, appealed or is it still pending?): _____
- d) Issues raised: _____
- e) Approximate date it was filed: _____
- f) Approximate date of disposition: _____

N/A

2) Have you filed an action in federal court that was dismissed because it was determined to be frivolous, malicious, or failed to state a claim upon which relief could be granted? ___ Yes No. If your answer is "Yes", describe each lawsuit. (If you had more than three actions dismissed based on the above reasons, describe the others on an additional page following the below outline.)

Lawsuit #1 dismissed as frivolous, malicious, or failed to state a claim:

- a) Defendants: _____
- b) Name of court and case number: _____
- c) The case was dismissed because it was found to be (check one): ___ frivolous ___ malicious or ___ failed to state a claim upon which relief could be granted.
- d) Issues raised: _____
- e) Approximate date it was filed: _____
- f) Approximate date of disposition: _____

N/A

Lawsuit #2 dismissed as frivolous, malicious, or failed to state a claim:

- a) Defendants: _____
- b) Name of court and case number: _____

- c) The case was dismissed because it was found to be (check one): _____ frivolous
_____ malicious or _____ failed to state a claim upon which relief could be granted.
- d) Issues raised: N/A
- e) Approximate date it was filed: _____
- f) Approximate date of disposition: _____

Lawsuit #3 dismissed as frivolous, malicious, or failed to state a claim:

- a) Defendants: N/A
- b) Name of court and case number: _____
- c) The case was dismissed because it was found to be (check one): _____ frivolous
_____ malicious or _____ failed to state a claim upon which relief could be granted.
- d) Issues raised: _____
- e) Approximate date it was filed: _____
- f) Approximate date of disposition: _____

3) Have you attempted to resolve the dispute stated in this action by seeking relief from the proper administrative officials, e.g., have you exhausted available administrative grievance procedures? Yes ___ No. If your answer is "No", did you not attempt administrative relief because the dispute involved the validity of a: (1) ___ disciplinary hearing; (2) ___ state or federal court decision; (3) ___ state or federal law or regulation; (4) ___ parole board decision; or (5) ___ other _____.

If your answer is "Yes", provide the following information. Grievance Number 5628.
Date and institution where grievance was filed 5/15/19 JOHN C CARPENTER LAW CENTER

Response to grievance: SEND A LETTER OUT TO DGT. AND NOT SIGN IT. (ACCOMPLISHING WHAT?)

E. REQUEST FOR RELIEF

I believe that I am entitled to the following relief:

- ① 1.6 MILLION DOLLARS (COMPENSATORY)
- ② 3.4 MILLION DOLLARS (PUNITIVE)
- ③ THE NAME OF JOHN C CARPENTER LAW ENFORCEMENT CENTER CHANGED TO THE NATHAN LAWRENCE LAW ENFORCEMENT CENTER.

I understand that a false statement or answer to any question in this complaint will subject me to penalties of perjury. **I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.** See 28 U.S.C. § 1746 and 18 U.S.C. § 1621.

(Name of Person who prepared or helped prepare this complaint if not Plaintiff)

Nathan Lawrence
(Signature of Plaintiff)

5-23-2019
(Date)

(Additional space if needed; identify what is being continued)

